



## **Bury Catholic Preparatory School – Privacy Notice and annexes**

The EU General Data Protection Regulation (GDPR) includes rules on giving privacy information to those whose data is held by an organisation (data subjects). These are more detailed and specific than in the DPA and place an emphasis on making privacy notices understandable and accessible. Data controllers are expected to take 'appropriate measures' to ensure that this is the case.

The school interprets this as using very clear language to outline each of the responsibilities for each of the data subject groups.

The GDPR say that the information provided to data subjects about how the school processes their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, particularly if addressed to a child; and
- free of charge.

These requirements are about ensuring that privacy information is clear and understandable for data subjects. This privacy notice deals with the overall privacy responsibilities of the school but includes, as annexes the particular notices that apply to parents, pupils under the age of 13, staff and Governors. The appropriate annex should be read by the appropriate data subject along with the overarching notice.

Each annex deals with two sources of data, that obtained directly from the subject and, data not obtained directly from the subject. For both sources the Identity and contact details of the data controller (and where applicable, the controller's representative) and the data protection officer are provided.

## **Privacy Notice Bury Catholic Preparatory School – parents (or guardians) of children at the school, or applying to join the school**

This annex should be read in conjunction with the introductory paragraphs in the covering document. ***The italicised paragraphs in red refer to guidance from the ICO on the compilation of privacy notices.***

*(The privacy notice should be provided at the time the data was obtained, if it was obtained directly from the data subject.)*

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

*(The purpose of the processing and the legal basis for processing must be clearly stated and the categories of personal data held must be clearly stated.)*

Data will be processed for the purposes of responding to requests for information about joining the school and the school will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. The data the school holds will be the minimum it requires to allow for a mutual decision to be arrived at over the entry to the school of your child, and (if applicable) to form and maintain the contract between you and the school.

*(Any recipient or categories of recipient must be clear and it should also be clear if data transfer to other countries and the safeguards in place.)*

The school will share your data with the following companies who have contracts with the school and who have equalled the school’s precautions, systems and procedures for dealing with data, these are:

- Catering
- Photographer
- Health care service provider
- IT Contractor
- IT software provider
- Assessment providers e.g. Target Tracker, Cem Durham University and the local authority. The school must provide EYFS Profile results to the Local Authority, which is under a duty to return this data to the relevant Government department

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the school organises, should this be envisaged for your child, you will be contacted for your consent, the consent will be limited in time and content if it is required.

*(The retention period for the data or the criteria used to determine the retention period.)*

The retention period for pupil data will be until the pupil reaches the age of 25.

Should your son or daughter not enter the school we will retain your data until the next potential entry point to Bury Catholic Preparatory School school in your child’s school career.

*(The existence of each data subject’s rights. The right to withdraw consent at any time.)*

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

*(The right to lodge a complaint at any time with a supervisory authority.)*

You can complain at any time about how the school has handled your data, the Information Commissioner is available as follows:

ICO helpline is 0303 123 1113. A template letter, should you need it is at the appended to this notice.

*(Where data is not obtained directly, the source from which it was obtained and whether or not it is a publicly available source.)*

*(For data obtained indirectly, the privacy notice should be provided within a one month (referred to as a reasonable period of time), when the first communication takes place with an individual, or if disclosure is envisaged to another recipient, at the latest, before the information is disclosed.)*

We will obtain the data the school requires from you, should we need data from other sources we will contact you first.

*(Whether the provision of personal data is part of a statutory or contractual requirement or obligation and the possible consequences of failing to provide the personal data.)*

We see the provision of personal data as necessary to properly admit your child to the school and to administer, and for the school to fulfil its obligations under the contract once your child is a pupil here.

*(The existence of automated decision making including profiling and the information about how decisions are made, the significance and the consequences.)*

There is no automated decision making or profiling involved in this data stream into and through the school.

## **Appendix**

[Your full address]

[Phone number]

[The date]

[Name and address of the organisation]

[Reference number (if provided within the initial response)]

Dear [Sir or Madam / name of the person you have been in contact with]

### **Information rights concern**

[Your full name and address and any other details such as account number to help identify you]

I am concerned that you have not handled my personal information properly.

[Give details of your concern, explaining clearly and simply what has happened and, where appropriate, the effect it has had on you.]

I understand that before reporting my concern to the Information Commissioner's Office (ICO) I should give you the chance to deal with it.

If, when I receive your response, I would still like to report my concern to the ICO, I will give them a copy of it to consider.

You can find guidance on your obligations under information rights legislation on the ICO's website ([www.ico.org.uk](http://www.ico.org.uk)) as well as information on their regulatory powers and the action they can take.

Please send a full response within 28 calendar days. If you cannot respond within that timescale, please tell me when you will be able to respond.

If there is anything you would like to discuss, please contact me on the following number [telephone number].

Yours faithfully

[Signature]

## **ANNEX B**

### **Privacy Notice Bury Catholic Preparatory School – Governors of the school.**

This annex should be read in conjunction with the introductory paragraphs in the covering document. The italicised paragraphs in red refer to guidance from the ICO on the compilation of privacy notices.

*(The privacy notice should be provided at the time the data was obtained, if it was obtained directly from the data subject.)*

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

*(The purpose of the processing and the legal basis for processing must be clearly stated and the categories of personal data held must be clearly stated.)*

Data will be processed for the purposes of responding to requests for information about joining the Board of the school and the school will therefore have a “legitimate interest” for processing basic personal data and, if necessary, sensitive personal data. The data the school holds will be the minimum it requires.

*(Any recipient or categories of recipient must be clear and it should also be clear if data transfer to other countries and the safeguards in place.)*

The school will share your data with the following companies who have contracts with the school and who have equalled the school’s precautions, systems and procedures for dealing with data, these are:

- IT Contractor
- IT software provider

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the school organises, should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it is required.

*(The retention period for the data or the criteria used to determine the retention period.)*

The retention period for data on Governors to be held will be 25 years.

*(The existence of each data subject’s rights. The right to withdraw consent at any time.)*

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

*(The right to lodge a complaint at any time with a supervisory authority.)*

You can complain at any time about how the school has handled your data, the Information Commissioner is available as follows:

ICO helpline is 0303 123 1113. A template letter, should you need it is at the appended to this notice.

*(Where data is not obtained directly, the source from which it was obtained and whether or not it is a publicly available source.)*

*(For data obtained indirectly, the privacy notice should be provided within a one month (referred to as a reasonable period of time), when the first communication takes place with an individual, or if disclosure is envisaged to another recipient, at the latest, before the information is disclosed.)*

We will obtain the data the school requires from you, should we need data from other sources we will contact you first.

*(Whether the provision of personal data is part of a statutory or contractual requirement or obligation and the possible consequences of failing to provide the personal data.)*

We see the provision of personal data as necessary to safeguard you and the school as it will allow the necessary checks to be made.

*(The existence of automated decision making including profiling and the information about how decisions are made, the significance and the consequences.)*

There is no automated decision making or profiling involved in this data stream into and through the school.

