



NEWMAN CATHOLIC TRUST

HEART SPEAKS TO HEART



St Bonaventure's Catholic Primary School

Privacy Notice for Parents & Pupils

2025-26

Review Cycle	Date of Policy	Reviewed by	Review Date
Annual	April 25	Board	April 26

Ratification

Role	Name	Signature	Date
Chair of Board	Chris Izuka		April 25
CEO	Dr Daniel Doyle		April 25

Commitment to Equality:

The Trust and its schools are committed to providing a positive working environment which is free from prejudice and unlawful discrimination and any form of harassment, bullying or victimisation. We have developed a number of key policies to ensure that the principles of Catholic Social Teaching in

relation to human dignity and dignity in work become embedded into every aspect of school life and these policies are reviewed regularly in this regard.

"Rooted in faith, we ignite a love of learning, foster inclusive education and empower every individual to achieve their utmost potential."

At the Newman Catholic Trust, we stand united in our unwavering mission to nurture a transformative educational experience, where every child is seen, valued and cherished as a unique gift from God. Rooted in faith, we ignite a love for learning that awakens curiosity, sparks imagination and fuels a lifelong journey of discovery.

Guided by the teachings of Christ and inspired by the profound wisdom of our namesake, Saint John Henry Newman, we strive to foster a community where inclusion is lived, diversity is embraced and every individual is empowered to fulfil their highest potential. As Newman said, *"To live is to change, and to be perfect is to have changed often."* We believe that education is a sacred journey of continual transformation—intellectually, spiritually and personally. We believe that true education is not just about knowledge, but about shaping hearts and minds, cultivating resilience and nurturing the whole person.

Our vision is simple yet profound: to be a beacon of hope and excellence, where students are not only academically accomplished but spiritually enriched and personally empowered to make a difference in the world. In all that we do, we strive to embody our core values:

- **Christ/Child Centred:** Placing the Gospel values, the teachings of Christ and the well-being of each child at the heart of every action we take.
- **Inclusive and Consultative:** Ensuring open communication and engagement with all members of our community.
- **Caring:** Showing empathy, understanding and support in navigating any challenges that may arise.
- **Transparent:** Fostering openness and honesty in all our interactions.
- **Strategic:** Approaching all matters with careful planning and consideration for the wider community.
- **Professional:** Maintaining the highest standards of conduct and integrity in our decision-making.
- **Accountable:** Taking responsibility for our actions and fulfilling our commitment to ensuring a safe and nurturing environment for all.

Under the UK General Data Protection Regulation and Data Protection Act 2018 laws you have a right to be informed about how the school uses any personal data we hold about you. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about pupils at our school.

We, Newman Catholic Trust, are the 'data controller' for the purposes of data protection law.

1.1 Categories of Personal Information

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

Pupils:

- Personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- Characteristics (such as spoken languages and free school meal eligibility)
- Safeguarding information (such as court orders and professional involvement)
- Special educational needs (including the needs and ranking)
- Attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Assessment and attainment (such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)

Parents:

- Contact details and contact preferences
- Bank details
- Photographs
- CCTV images captured in school

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

Pupils:

- Medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- Personal characteristics such as ethnicity

Parents:

- Characteristics, such as ethnicity, languages spoken and eligibility for certain benefits
- Family circumstances
- Physical and mental health, including medical conditions
- Support received, including care packages, plans and support providers

This list is not exhaustive, to access the current list of categories of information we process please contact the School Office.

1.2 Why we collect and use personal information

The personal data collected is essential, for the school to fulfil their official functions and meet legal requirements.

We collect and use pupil information for the following purposes:

- To support pupil learning
- To monitor and report on pupil attainment progress

- To provide appropriate pastoral care
- To assess the quality of our services
- To keep children safe (food allergies, or emergency contact details)
- To meet the statutory duties placed upon us by the Department for Education

We collect and use parents information for the following purposes:

- Report to you on your child's attainment and progress
- Keep you informed about the running of the school (such as emergency closures) and events
- Process payments for school services and clubs
- Provide appropriate pastoral care
- Protect pupil welfare
- Administer admissions waiting lists
- Assess the quality of our services
- Carry out research
- Comply with our legal and statutory obligations

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing pupil information are:

1. Art. 6 GDPR Lawfulness of processing

1. Processing shall be lawful only if and to the extent that at least one of the following applies:
 1. the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
 2. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
 3. processing is necessary for compliance with a legal obligation to which the controller is subject;
 4. processing is necessary in order to protect the vital interests of the data subject or of another natural person;
 5. processing 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;
 6. processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Point (f) of the first subparagraph shall not apply to processing carried out by public authorities in the performance of their tasks.

2. Member States may maintain or introduce more specific provisions to adapt the application of the rules of this Regulation with regard to processing for compliance with points (c) and (e) of paragraph 1 by determining more precisely specific requirements for the processing and other measures to ensure lawful and fair processing including for other specific processing situations as provided for in [Chapter IX](#).
3. ¹The basis for the processing referred to in point (c) and (e) of paragraph 1 shall be laid down by:

1. Union law; or

2. Member State law to which the controller is subject.

²The purpose of the processing shall be determined in that legal basis or, as regards the processing referred to in point (e) of paragraph 1, shall be necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. ³That legal basis may contain specific provisions to adapt the application of rules of this Regulation, *inter alia*: the general conditions governing the lawfulness of processing by the controller; the types of data which are subject to the processing; the data subjects concerned; the entities to, and the purposes for which, the personal data may be disclosed; the purpose limitation; storage periods; and processing operations and processing procedures, including measures to ensure lawful and fair processing such as those for other specific processing situations as provided for in [Chapter IX](#). ⁴The Union or the Member State law shall meet an objective of public interest and be proportionate to the legitimate aim pursued.

4. Where the processing for a purpose other than that for which the personal data have been collected is not based on the data subject's consent or on a Union or Member State law which constitutes a necessary and proportionate measure in a democratic society to safeguard the objectives referred to in [Article 23](#)(1), the controller shall, in order to ascertain whether processing for another purpose is compatible with the purpose for which the personal data are initially collected, take into account, *inter alia*:

1. any link between the purposes for which the personal data have been collected and the purposes of the intended further processing;
2. the context in which the personal data have been collected, in particular regarding the relationship between data subjects and the controller;
3. the nature of the personal data, in particular whether special categories of personal data are processed, pursuant to [Article 9](#), or whether personal data related to criminal convictions and offences are processed, pursuant to [Article 10](#);
4. the possible consequences of the intended further processing for data subjects;
5. the existence of appropriate safeguards, which may include encryption or pseudonymisation.

In addition, concerning any special category data:

2. Art. 9 GDPR Processing of special categories of personal data

1. Processing of personal data 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 shall be prohibited.
2. Paragraph 1 shall not apply if one of the following applies:
 1. the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;
 2. processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

3. 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;
4. processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;
5. processing relates to personal data which are manifestly made public by the data subject;
6. processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
7. 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, 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;
8. processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;
9. processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;
10. processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with [Article 89\(1\)](#) based on Union or Member State law which shall be proportionate to the aim pursued, 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.

3. Personal data referred to in paragraph 1 may be processed for the purposes referred to in point (h) of paragraph 2 when those data are processed by or under the responsibility of a professional subject to the obligation of professional secrecy under Union or Member State law or rules established by national competent bodies or by another person also subject to an obligation of secrecy under Union or Member State law or rules established by national competent bodies.
4. Member States may maintain or introduce further conditions, including limitations, with regard to the processing of genetic data, biometric data or data concerning health.

1.3 Collecting personal information

Pupils:

We collect pupil information via method of data collection used, for example registration forms at the start of the school year or Common Transfer File (CTF) or secure file transfer from

previous school.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this and we will tell you what you need to do if you do not want to share this information with us.

Parents:

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

1.4 Storing personal data

Pupils:

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please contact the School Office.

Parents:

We keep personal information about you while your child is attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Our record retention schedule/records management policy sets out how long we keep information about parents and carers.

1.5 Who we share personal information with

Pupils:

We routinely share pupil information with:

- Schools
- Local authorities
- Youth support services (pupils aged 13+)
- The Department for Education (DfE)
- Clifton Diocese
- School nurses
- NHS
- The Cardinal Newman Catholic Educational Trust

Parents:

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with combined UK data protection laws), we may share personal information about you with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- Government departments or agencies
- Our regulator
- Suppliers and service providers – to enable them to provide the service we have contracted them for

- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

1.6 Why we regularly share pupil information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

1.7 Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under:

Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

For more information, please see 'How Government uses your data' section.

Local Authorities

We may be required to share information about our pupils with the local authority to ensure that they can conduct their statutory duties under

- the [Schools Admission Code](#), including conducting Fair Access Panels.

1.8 Requesting access to your personal data

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our School Office.

Depending on the lawful basis above, you may 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
- a right to seek redress, either through the ICO, or through the courts

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

1.9 Withdrawal of consent

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting our School Office.

1.10 Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our School Office.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

1.11 Last updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time.

1.12 Contact

If you would like to discuss anything in this privacy notice, please contact: The School Office, St Bonaventure's Catholic Primary School, Egerton Road, Bristol BS7 8HP.

How Government uses your data

The pupil data that we lawfully share with the DfE through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

1.13 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>

1.14 The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD).

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the department.

It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

Sharing by the Department

The law allows the Department to share pupils' personal data with certain third parties, including:

- schools
- local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the Department's NPD data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Organisations fighting or identifying crime may use their legal powers to contact DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

For information about which organisations the Department has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website: <https://www.gov.uk/government/publications/dfe-external-data-shares>

How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

To contact DfE: <https://www.gov.uk/contact-dfe>