# LUMEN CHRISTI CATHOLIC MULTI ACADEMY

## PUPIL/STUDENT PRIVACY NOTICE

**1. Scope**

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

**2. Responsibilities**

2.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Lumen Christi Catholic Multi Academy collecting or processing their personal data.

2.2 All Directors, School Standards Committee Representatives, employees and volunteers of Lumen Christi Catholic Multi Academy who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

**3. Privacy notice**

3.1 **Who are we?**

Lumen Christi Catholic Multi Academy is a company based in the United Kingdom
The Company's object is specifically restricted to the following:

- advancement for the public benefit, education in the United Kingdom, in by establishing, maintaining, carrying on, managing and developing Catholic schools designated as such
- offering a broad and balanced curriculum
- offering a curriculum appropriate to the needs of its students
- in each case conducted as Catholic Schools in accordance with the Code of Canon Law of the Latin Church and the doctrinal, social and moral teachings of the Catholic Church
- following the directives and policies issued by the Diocesan Bishop to ensure that the formation, governance and education of the schools is based on the principles of Catholic doctrine
- at all times serving as a witness to the Catholic faith in Our Lord Jesus Christ.

Our Data Protection Officer is Hollie Parrish and can be contacted here:

- h.parrish@lumenchristi.org.uk
- 0121 464 4643

The personal data we would like to collect from you is:

| **Personal data type:** | **Source** (where Lumen Christi Catholic Multi Academy) obtained the personal data from if it has not been collected directly from you, the data subject |
|---|---|
| Pupil/Student Contact Information | Pupil/Student Parent/Carer |
| Parent/Carer and Emergency Contact Information | Pupil/Student Parent/Carer |
| Sibling Information (if attending Lumen Christi School) | Pupil/Student Parent/Carer |
| Medical Information & Emergency Treatment Consent | Pupil/Student Parent/Carer |
| Ethnic Monitoring Information | Pupil/Student Parent/Carer |
| Biometric Data | Pupil/Student |
| Benefit Data & National Insurance Number (Parent/Carer if applicable) | Pupil/Student Parent/Carer |
| Photographs | Pupil/Student |

The personal data we collect will be used for the following purposes:

- Administering your child's progress through the education system
- Maintaining records of your child's participation in school life
- Provide appropriate pastoral care
- Assess the quality of our provision

Our legal basis for processing for the personal data:

- Compliance with legal obligations to ensure children receive education, attend school on a regular basis, and are kept safe.

Any legitimate interests pursued by us, or third parties we use, are as follows:

- To enable your child to participate in extra-curricular school activities.

The special categories of personal data concerned are:

- Ethnic origin
- Religious beliefs
- Biometric data
- Health and welfare data

3.2 **Consent**

As we not relying on consent as the legal basis for processing your child's data we do not need to seek your permission to process the data. By issuing this notice to you we are fulfilling our legal duty to inform you that the processing is taking place.

3.3 **Disclosure**

Lumen Christi Catholic Multi Academy will not pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the purposes described in this document as part of the processing activities:

| **Organisation and location, including any third country (non-EU) international organisations** | **Safeguards in place to protect your personal data** |
|---|---|
| BromCom, UK – information management system | Hosted on secure servers. Access to data controlled by permissions. |
| MyConcern – One Team Logic, UK – safeguarding information management system | |
| ParentPay – financial payments package | |
| CPOMS Ltd, UK – safeguarding information management system | |
| One Advanced, UK – information management system | |
| 3P Learning Ltd, UK – Online programmes | |
| The Foundation Stage Forum, UK – online learning journal | |
| Eduspot, UK – phone and text service | |
| Groupcall Ltd, UK – phone and text service | |
| Fisher Family Trust, UK – Assessment Tracking | |
| Capita SIMS, UK – information management system | |
| Optimum, UK – Assessment Tracking | |
| Equin Ltd., UK – Assessment Tracking | |
| Wonde, UK – used to extract data from MIS to import into 3rd party systems | |
| Inventry, UK – electronic signing in system | |
| SchoolBooking.com, UK – Room booking system | |
| ESS Reading Cloud, UK – library system | |
| Locker, UK – Software for automatic user creation on servers and in Office365/Teams | |
| TES EduCare, UK –training provider | |

3.4 **Retention period**

Lumen Christi Catholic Multi Academy will process personal data for as long as there is a purpose for processing (while the child is on roll at the school). Personal data will be stored according to guidance, until the child is 25 years old where upon it will be securely disposed of. When a child moves outside of Lumen Christi Catholic Multi Academy for secondary provision, their file will be passed on to the destination school. Only data regarding health and safety, safeguarding and special educational needs will be retained in accordance with the retention schedule.

3.5 **Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Lumen Christi Catholic Multi Academy refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

3.6 **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Lumen Christi Catholic Multi Academy or third parties acting on our behalf, or how your complaint has been handled, you have the right to lodge a complaint directly with the Information Commissioner's Office and Lumen Christi Catholic Multi Academy's Data Protection Officer.

The details for each of these contacts are:

| | **Supervisory authority contact details** | **Data Protection Officer contact details** |
|---|---|---|
| Contact Name: | Information Commissioner's Office | Hollie Parrish |
| Address line 1: | Wycliffe House | St. Thomas Aquinas Catholic School |
| Address line 2: | Water Lane | Wychall Lane |
| Address line 3: | Wilmslow | Birmingham |
| Address line 4: | Cheshire | West Midlands |
| Address line 5: | SK9 5AF | B38 8AP |
| Email: | casework@ico.org.uk | h.parrish@lumenchristi.org.uk |
| Telephone: | 0303 123 1113 (local rate) | 0121 464 4643 |

3.7 **Privacy statement**

Read more about how and why we use your data here: http://www.lumenchristi.org.uk/Data-Protection/

**4. Online privacy statement**

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

*"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".*

How we use your information

This privacy notice tells you how we, Lumen Christi Catholic Multi Academy , will collect and use your personal data to:

- Support learning
- Monitor and report on pupil/student progress
- Provide appropriate pastoral care
- Protect pupil/student welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing

Why does Lumen Christi Catholic Multi Academy need to collect and store personal data?

In order for us to provide educational provision, we need to collect personal data for correspondence purposes, administering your child's progress through the education system, maintaining records of your child's participation in school life, providing appropriate pastoral care and assessing the quality of our provision.

In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes we would contact you for additional consent.

Will Lumen Christi Catholic Multi Academy share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Lumen Christi Catholic Multi Academy in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with our own procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are

legally required to do otherwise. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about pupils with:

- *Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions*
- *Relevant safeguarding organisations as part of the Collaborative Working Information Sharing Agreement*
- *The Department for Education*
- *Educators and examining bodies*
- *Our regulator [specify as appropriate, e.g. Ofsted, Independent Schools Inspectorate]*
- *Suppliers and service providers – to enable them to provide the service we have contracted them for*
- *Financial organisations*
- *Central and local government*
- *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*
- *Professional bodies*

How will Lumen Christi Catholic Multi Academy use the personal data it collects about me?
Lumen Christi Catholic Multi Academy will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up-to-date, and not keep it for longer than is necessary. Lumen Christi Catholic Multi Academy is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Lumen Christi Catholic Multi Academy contact me?
Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that Lumen Christi Catholic Multi Academy holds about me?
Lumen Christi Catholic Multi Academy at your request, can confirm what information we hold about you and how it is processed. If Lumen Christi Catholic Multi Academy does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.

- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Lumen Christi Catholic Multi Academy or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it was not collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Lumen Christi Catholic Multi Academy accepts the following forms of ID when information on your personal data is requested:

- current passport bearing a photograph and signature, or driving license, bearing a photograph and signature.

If you do not hold a current passport or driving license two copies of other identification documents may be accepted as an alternative, such as:

- birth certificate
- utility bill from preceding three months bearing current address
- current vehicle registration document
- bank statement from preceding three months
- current rent book.

Contact details of the Data Protection Officer / GDPR Owner:

| | **Data Protection Officer contact details** |
|---|---|
| Contact Name: | Hollie Parrish |
| Address line 1: | St. Thomas Aquinas Catholic School |
| Address line 2: | Wychall Lane |
| Address line 3: | Birmingham |
| Address line 4: | West Midlands |
| Address line 5: | B38 8AP |
| Email: | h.parrish@lumenchristi.org.uk |
| Telephone: | 0121 464 4643 |

Lumen Christi
CATHOLIC MULTI ACADEMY

**Document Owner and Approval**

The Data Protection Officer is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above.

**Change History Record**

| Issue | Description of Change | Approval | Date of Issue |
|---|---|---|---|
| 1.00 | Initial issue | Hollie Parrish | 9.4.18 |
| 2.00 | Revision | Hollie Parrish | 30.6.21 |
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