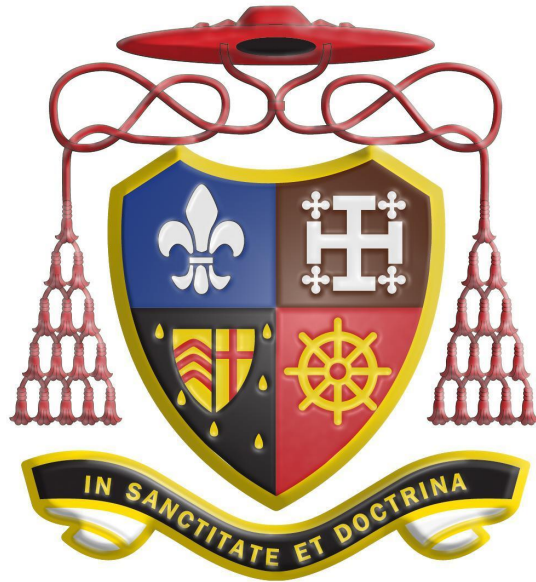


St Bonaventure's School



STATUTORY PRIVACY NOTICES

Date Of Approval: Sep 2026

Date of Review: Sep 2027

Data Controller:	St Bonaventure's Catholic School, Boleyn Road, Forest Gate, London, E7 9QD
Data Protection Officer (DPO):	Mr Kevin Imrith (Contact: k.imrith@stbons.org)
Regulatory Framework:	UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, and Data Protection and Digital Information Legislation
Supervisory Authority:	Information Commissioner's Office (ICO) - https://ico.org.uk 0303 123 1113

1. Privacy Notice - Pupils and Parents

Under United Kingdom data protection legislation, individuals maintain the right to be informed regarding how St Bonaventure's Catholic School collects, stores, uses, and shares personal data relating to pupils and their parents or carers. The school fulfills this statutory obligation by providing clear, accessible, and transparent privacy notices (also known as fair processing notices).

Why We Collect and Use Pupil Information

In accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025, and domestic education legislation—including Articles 6 and 9 of the UK GDPR, the Education Act 1996, the Children Acts 1989 and 2004, and Regulation 5 of the Education (Information About Individual Pupils) (England) Regulations 2013—we process pupil information for the following specific purposes:

- To support pupil learning, academic progression, and educational development.
- To monitor, track, and report on pupil progress and attainment.
- To provide appropriate pastoral care and maintain high standards of safeguarding and child protection.
- To assess, evaluate, and enhance the overall quality of our educational services.
- To comply with statutory and legal obligations concerning educational data sharing and reporting.
- To maintain campus security and protect physical premises via access controls and closed-circuit television (CCTV) monitoring.
- To operate efficient school dining and cashless catering services securely.

Categories of Information Collected

The categories of pupil and family information that the school collects, holds, and shares include:

- **Personal details:** Full names, unique pupil numbers (UPN), dates of birth, home addresses, and proof of identity.
- **Contact details:** Names, phone numbers, postal addresses, and email addresses of parents, carers, and designated emergency contacts.
- **Characteristics:** Ethnic origin, primary and home languages spoken, nationality, eligibility for free school meals (FSM), pupil premium status, and special educational needs or disabilities (SEND).
- **Attendance data:** Sessions attended, total number of absences, reasons for absence, and exclusion records.
- **Assessment data:** Termly subject marks, internal evaluation results, public examination outcomes, and target levels.

- **Medical and health information:** Known medical conditions, allergies, care plans, emergency contacts, physical and mental health records, and immunisation data.
- **Behavioural and achievement data:** Commendations, merit points, detentions, internal exclusions, fixed-term suspensions, or permanent exclusions.
- **Post-16 learning details:** Specific courses studied, guided learning hours, destinations, and post-16 progression tracks.
- **Safeguarding and child protection records:** Confidential welfare concerns, multi-agency referrals, local authority liaison notes, and court orders.
- **Media and electronic data:** Photographs, video recordings, digital work portfolios, and CCTV footage captured on school grounds.
- **Biometric data:** Biometric automated recognition templates (e.g., finger scans) utilised exclusively for cashless canteen catering.

Lawful Basis for Processing Data

We only collect and process personal data when United Kingdom law permits us to do so. Most commonly, processing is conducted under the following legal bases:

- **Public Duty / Statutory Task (Article 6(1)(e)):** 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 (delivering statutory education and pastoral care).
- **Legal Obligation (Article 6(1)(c)):** Processing is necessary for compliance with a legal obligation to which the school is subject (such as child protection duties, health and safety regulations, and statutory DfE returns).
- **Vital Interests (Article 6(1)(d)):** Processing is necessary to protect the vital interests of the data subject or another natural person in emergency medical scenarios.
- **Consent (Article 6(1)(a)):** Where processing is optional and not covered by legal duties (e.g. promotional photos, optional extra-curricular digital tools, or biometric catering registration). Where processing relies on consent, it can be withdrawn at any time by contacting the Data Protection Officer.
- **Legitimate Interests (Article 6(1)(f) & DUAA 2025):** Processing for internal administration, IT security, and operational improvements where balanced against individual rights.

For Special Category Data (such as ethnicity, biometric templates, or health data), we process data under Article 9 conditions, predominantly for reasons of substantial public interest (statutory child welfare, equality monitoring, public health requirements) or explicit consent.

Special Provisions for Biometric Data (Cashless Catering)

Where biometric systems are utilised (e.g., automated finger recognition for cashless canteen purchasing), the school strictly complies with Section 26 of the Protection of Freedoms Act 2012 and Article 9(2)(a) of the UK GDPR:

- Written parental consent must be obtained from at least one parent/carer prior to processing a child's biometric data.
- If a pupil objects (verbally or physically) to biometric processing, or if a parent refuses/withdraws consent, the school will immediately provide an alternative, non-biometric method of access.
- Biometric data is converted into an encrypted numerical algorithm/template. Raw fingerprint images are NEVER stored.
- Biometric templates are automatically permanently erased upon the pupil leaving the school or upon receipt of a consent withdrawal notice.

Data Storage, Retention and Security

Pupil records are retained securely in line with the school's Data Retention Schedule, structured upon national guidelines from the Information and Records Management Society (IRMS). Standard pupil educational records are held until the pupil reaches the age of 25. Records involving significant safeguarding concerns, child protection files, or complex special educational needs (SEN) interventions are held longer in compliance with statutory guidance and legal duties.

Who We Share Pupil Information With

We routinely share pupil data with authorised third parties where legally required or necessary for educational provision, including:

- Educational institutions, schools, and colleges that pupils attend after leaving us.
- The Local Authority (London Borough of Newham) for statutory admissions, attendance, SEN provision, and welfare monitoring.
- The Department for Education (DfE) via statutory data collections (such as the School Census).
- National Health Service (NHS) bodies and public health teams for vaccination and health intervention programs.
- The Police, Social Care Services, and multi-agency safeguarding hubs where necessary for child protection.
- Approved Examination Boards for qualifications, assessment management, and access arrangements.
- Fully vetted third-party IT software and online learning platforms (e.g., Kerboodle, SENECA, SPARX, Google Workspace, etc...) strictly required to support digital learning under rigorous data processing contracts.

International Data Transfers

The school predominantly stores and processes personal data within the United Kingdom or the European Economic Area (EEA). However, where third-party educational software providers or cloud hosting facilities transfer personal data outside the UK/EEA (for example, servers located in the United States), the school ensures that appropriate statutory safeguards are in place in accordance with Chapter V of the UK GDPR and the Data (Use and Access) Act 2025. These safeguards include:

- UK Regulations / Adequacy Decisions granted by the UK Secretary of State.
- Execution of approved UK International Data Transfer Agreements (IDTAs) or UK Addendums to EU Standard Contractual Clauses (SCCs).
- Verification of vendor certification under recognised international frameworks (such as the UK-US Data Bridge).

National Pupil Database & Secondary Services

We pass pupil data to the Department for Education for inclusion in the National Pupil Database (NPD), which supports long-term educational research and policy development. For pupils aged 13+, we pass details to the Local Authority youth support services. For pupils aged 14+, data is shared with the Learner Record Service to issue Unique Learner Numbers (ULN). Parents, or pupils aged 16 and over, can request that youth services receive only basic details (name, address, date of birth) by contacting the Data Protection Officer.

2. Privacy Notice - School Workforce

St Bonaventure's Catholic School processes personal data relating to teachers, support staff, supply staff, volunteers, and employment applicants to meet our legal obligations and manage operational employment relationships.

Categories of Workforce Data Collected

- **Personal details:** Full name, home address, personal email, telephone numbers, employee or teacher reference number, National Insurance number, and proof of legal entitlement to work in the United Kingdom.
- **Characteristics:** Gender, date of birth, ethnic group, emergency contact details, and marital status.
- **Contractual & Financial information:** Employment start date, job role, salary levels, bank details, tax codes, pension details, contract terms, and working hours.
- **Work absence records:** Sickness leave, medical certificates, fit notes, maternity/paternity/parental leave records, and leave requests.
- **Qualifications & Performance:** Academic degrees, teaching status, subject specialisms, training certificates, appraisal notes, performance reviews, and disciplinary/grievance records.
- **Vetting information:** Enhanced Disclosure and Barring Service (DBS) disclosure status, Prohibition from Teaching checks, Section 128 checks, online pre-employment search logs, and employment references.

Why We Collect and Use Workforce Data

Workforce data is essential for operational execution. The legal bases for processing workforce data include contract performance (Article 6(1)(b)), legal obligations (Article 6(1)(c)), and public interest tasks (Article 6(1)(e)). Specific purposes include:

- Enabling a comprehensive understanding of the workforce and its deployment across school departments.
- Informing recruitment, selection, performance management, and succession planning policies.
- Facilitating payroll processing, statutory tax deductions, pension contributions, and employee benefits.
- Meeting statutory reporting requirements, including mandatory workforce census returns.
- Fulfilling employer health, safety, duty of care, and safeguarding obligations.

Sharing Workforce Information

We do not share workforce data without consent unless legally permitted or contractually required. We routinely share data with:

- The Local Authority under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007.
- The Department for Education (DfE) to inform workforce research and national statistical returns.
- The Roman Catholic Diocese of Brentwood in respect of church school governance, leadership monitoring, and senior appointments.
- Payroll providers, pension scheme administrators (Teachers' Pensions and Local Government Pension Scheme), and Occupational Health services.

3. Privacy Notice - Governors and Trustees

This privacy notice explains how St Bonaventure's Catholic School collects, stores, and processes personal data regarding school governors and trustees who contribute to school governance.

Data Collected on Governors

- **Contact details:** Full name, home address, personal email address, and telephone numbers.
- **Demographic details:** Date of birth, gender, and marital status.
- **Governance records:** Category of governor, appointment dates, term of office, nomination documents, register of business and pecuniary interests, and meeting attendance logs.
- **Vetting & Qualification data:** Enhanced DBS status, Section 128 check details, skills audits, and training completion records.
- **Special category data:** Ethnicity, religion, and disability status provided voluntarily for statutory equality monitoring.

Lawful Basis & Sharing for Governors

Processing governor data is necessary to comply with legal obligations (e.g. maintaining a governing body under the Equality Act 2010, the School Governance Regulations, and the Education Act) and to fulfill our statutory public duty. We share governor information with central and local government bodies, the DfE (via the statutory 'Get Information About Schools' register), and the Roman Catholic Diocese of Brentwood as legally required.

4. Statutory Data Subject Rights & Complaints Procedure

Under UK data protection legislation (UK GDPR, Data Protection Act 2018, and Data (Use and Access) Act 2025), all data subjects (pupils, parents, staff, governors) possess fundamental statutory rights regarding their personal data:

Your Statutory Rights

- **Right of Access (Subject Access Request - SAR):** The right to request access to and a copy of the personal data held about you by the school. In accordance with updated statutory standards, the school is required to conduct reasonable and proportionate searches when responding to requests. Requests will be fulfilled without undue delay and within one calendar month of identity verification (with provisions to pause the compliance clock if additional clarification is necessary).
- **Right to Rectification:** The right to request correction of inaccurate, incomplete, or out-of-date personal information.
- **Right to Erasure ('Right to be Forgotten'):** The right to request deletion of personal data where there is no statutory legal requirement or public duty for its continued processing.
- **Right to Restrict or Object:** The right to object to processing based on public task or legitimate interest, or to restrict processing during legal disputes.
- **Right to Data Portability:** The right to request that personal data provided directly by you be transferred electronically to another organisation under specific automated processing conditions.
- **Automated Decision-Making:** The right not to be subject to decisions made solely by automated processing unless safeguards including human intervention and representation are provided. (Note: St Bonaventure's Catholic School does not utilize sole automated decision-making systems for significant legal decisions).

Exercising Your Rights & Contacting the DPO

If you wish to submit a Subject Access Request or exercise any data subject rights, please contact the Data Protection Officer:

■ DPO CONTACT DETAILS

Data Protection Officer: Mr Kevin Imrith

Email Address: k.imrith@stbons.org

Postal Address: St Bonaventure's Catholic School, Boleyn Road, Forest Gate, London, E7 9QD

School Direct Telephone: 020 8472 3884

Complaints Procedure (Direct Complaint & Supervisory Escalation)

We take concerns and complaints regarding data collection and handling very seriously. In accordance with statutory requirements, the school operates a direct complaints handling procedure. If you believe our processing of personal data is unfair, misleading, or non-compliant, please raise your concern with our Data Protection Officer in the first instance.

If you remain unsatisfied with our internal response or wish to escalate the matter, you have the right to lodge a complaint directly with the United Kingdom supervisory authority:

■ SUPERVISORY AUTHORITY DETAILS

Supervisory Authority: Information Commission (formerly Information Commissioner's Office - ICO)

Website / Online Form: <https://ico.org.uk/make-a-complaint/>

Helpline: 0303 123 1113

Postal Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF