



ST HILDA'S
CE HIGH SCHOOL

Privacy Notice

Approved by Governing Committee: Business Resources Committee

Ratified by Full Governing Body: 18th June 2026

Next Review Month: June 2027

Policy Owner / Author: KK

Review Frequency: Annual

This policy remains in force until superseded by a revised policy approved by the Governing Board.

CHRIST JESUS AS OUR CORNERSTONE

Ephesians 2:20

THE ST HILDA'S FAMILY

We are the St Hilda's family, with **Jesus Christ** as our **cornerstone**.
Building on foundations of **wisdom hope community dignity and equality**
we nurture and support one another to be our very best.

St Hilda's CE High School – Privacy Notice

Introduction & Scope

St Hilda's CE High School ("the school", "we", "us") is committed to safeguarding the privacy rights of all individuals whose personal data we process.

This policy applies to all personal data processed by the school relating to our community, including but not limited to: pupils, parents/carers, staff (teaching and non-teaching), governors, volunteers, visitors, applicants, and other individuals associated with the school.

The school is the Data Controller for the personal data it processes.

Data Protection Officer (DPO) / Contact

Data Protection Officer is:

Name: Judicium Education

Contact: 0345 548 7000 / enquiries@judicium.com

Address: Judicium HQ, 98 Theobalds Road, London, WC1X 8WB Our School Data Protection Lead

Name: K Kearns

Contact: 0151 733 2709 / kkearns@st-hildas.co.uk

If you have any questions or concerns about how we handle personal data, or wish to exercise your rights, please contact the School Data Protection Lead in the first instance.

Categories of Personal Data Collected

Depending on your role, we may collect and process some or all of the following categories of personal data:

Pupil / Student Data

- Identity and contact information (name, address, date of birth, contact numbers, emergency contacts)
- Unique pupil identifiers, class/year group, photograph, video or audio recordings (e.g., for school records, website, yearbook)
- Attendance, behaviour, sanctions and rewards records
- Academic records: assessments, exam results, progress, grades

- Special educational needs, disability information, and any SEND provision data
- Health and medical data (allergies, dietary needs, medical conditions)
- Safeguarding or pastoral records, welfare, counselling, wellbeing data
- ICT account / login data, usage logs where relevant (e.g., school IT systems, learning platforms)
- Participation in clubs, trips, extra-curricular activities, consent/consents given

Parent / Carer Data

- Identity and contact information (name, address, phone, email)
- Relationship to pupil, emergency contact details
- Eligibility for free school meals or funding-based support
- Consent records (e.g., for photographs, trips, activities, data sharing)
- Communication history with the school

Staff (Teaching and Non-Teaching), Governors, and Volunteers

- Identity and contact information (name, address, contact details)
- Employment or engagement records (contract, role, payroll, pension, tax, attendance, performance, training, qualifications)
- DBS (Disclosure and Barring Service) or background check data
- Safeguarding and disciplinary records where relevant
- Photograph / image / CCTV data (e.g., for ID badges, site security)
- Teaching / employment history, references, professional development data
- ICT access, system login, and usage logs

Visitors, Contractors and Other Individuals (including Volunteers)

- Identity and contact information, organisation (if applicable)
- Sign-in / sign-out records, visit logs, temporary ID or photograph (if issued for security)
- CCTV or site security data (if captured during visit)
- Any consent or declaration provided (e.g. for activities, photo/video use)

Purposes and Lawful Bases for Processing Personal Data

We collect and process personal data only when we have a valid lawful basis, and limit usage to what is strictly necessary.

Core Purposes

- To provide education and pastoral care to pupils; support their development, progress, wellbeing and safety.
- To manage admissions, attendance, behaviour, assessments, SEND provision, safeguarding, health and welfare.
- To administer staff employment, payroll, performance, training, and comply with statutory duties.

- To manage school operations: trips, events, communications, catering, IT systems, site security, maintenance.
- To administer consent-based activities (e.g., school photographs, extra-curricular, publicity).
- To communicate with parents/carers, external agencies, partners, and fulfil statutory reporting (e.g., to local authority, DfE, exam boards).

Lawful Bases Used (depending on type of data and processing)

- **Legal obligation** – to comply with statutory obligations under education, safeguarding, health & safety, employment law.
- **Public task / Official authority** – processing necessary for the school's official functions as a maintained school / educational institution.
- **Contract** – processing necessary for performance of contract (e.g., employment contracts, service agreements, school meals/trips).
- **Consent** – for optional or non-statutory uses such as photographs, extracurricular activities, marketing/promotional materials, website or social media. Consent may be withdrawn at any time without affecting statutory services.
- **Vital interests** – where processing is necessary to protect someone's life or health (e.g. medical emergencies).
- **Legitimate interests** – in limited cases, e.g. site security (CCTV), school administration, safeguarding, IT security — only when such interests do not override the privacy rights of individuals.

Where we process so-called “special category data” (e.g. health, disability, ethnicity, religious beliefs, safeguarding data, criminal records) or criminal-offence data (e.g. DBS checks), we ensure we meet additional legal requirements under the DPA 2018.

How We Use and Share Personal Data

Internal Use

- Delivering teaching, learning, pastoral support and extra-curricular activities.
- Monitoring attendance, behaviour, progress, safeguarding and wellbeing.
- Managing staff employment, payroll, performance, training and statutory compliance.
- Managing site security, health & safety, access control, CCTV systems and visitor logs.
- Communicating with parents, carers and other stakeholders.
- Administering school operations — trips, events, catering, IT systems, resource management.
- Maintaining records (academic, pastoral, medical, safeguarding, admissions, attendance, statutory returns).

Sharing with Third Parties / External Agencies

We may share personal data with third parties where required or permitted, including:

- Local authorities, statutory / safeguarding organisations, social care, health professionals (e.g., school nurses).
- The Department for Education (DfE), exam boards, regulatory bodies, funding agencies
- e.g., for statutory school census, exam entries, funding, performance data.
- External service providers acting on our behalf (e.g., MIS providers, cloud storage, IT support, catering, transport providers, external counsellors), under contractual agreements ensuring GDPR compliance.
- Other schools, where a pupil transfers or when collaboration / joint activities occur.
- Police, courts or other authorities, where legally required (e.g., safeguarding, criminal investigations, health & safety, legal defence).
- Where explicit consent has been given, for purposes such as marketing, publicity, events, external communications.

We will only share the minimum data required, and always ensure secure methods of data transfer and confidentiality.

Data Storage, Security and Retention

- All personal data — whether electronic or paper-based — is stored securely. Electronic data is held on secure servers or trusted cloud services, with access controls (e.g., role-based
- access, passwords, encryption), in accordance with the school's data security measures. Paper records are kept in locked filing cabinets or secure storage.
- We apply data-minimisation and "privacy by design" — collecting only what is necessary and ensuring data is accurate, up to date, and limited to defined purposes.
- We retain personal data only for as long as necessary. Retention periods follow statutory guidance (e.g., archiving exam records, pupil files, SEND records, staff records) and the School's Record Management and Retention Schedule. For example, pupil records may be kept until the pupil is of age 25 or beyond, depending on statutory requirements.
- When personal data is no longer required, it will be securely disposed of: electronic data will be permanently deleted; paper records will be shredded / destroyed.

Rights of Data Subjects

Individuals whose data we process have the following rights under UK GDPR / DPA 2018:

- Right to be informed — about what data is processed, why, how, and with whom it is shared (this notice provides that information)
- Right of access — you may request to see the personal data we hold about you or your child/ dependent
- Right to rectification — you may ask for inaccuracies to be corrected
- Right to erasure — in certain circumstances you may request deletion of your data (subject to statutory requirements)

- Right to restrict processing — under certain conditions, to limit how data is used
- Right to object — to certain processing, especially when based on legitimate interests or for direct marketing / publicity
- Right to data portability — for data processed by contract or consent, you may request a copy in structured, commonly used format
- Right to withdraw consent — where processing is based on consent (e.g., photos, optional activities)
- Rights in relation to automated decision-making / profiling — where relevant (if not used currently)

Requests to exercise these rights should be submitted to the DPO.

If you believe your data has been misused or mishandled, you may also raise a complaint with the Information Commissioner's Office (ICO).

Consent, Transparency & Child-Friendly Information

- Where we rely on consent (e.g., photographs, marketing, optional activities), we will ensure consent is freely given, specific, informed and unambiguous. Consent forms will reference this Privacy Notice.
- For pupils (especially younger ones), we will provide a simplified, child-friendly summary of this Privacy Notice to help them understand their data rights. This may be included in induction packs, school handbooks, or via age-appropriate communication.
- For parents, carers, staff, volunteers, and visitors — the full Privacy Notice will be published on the school website and made available on request. It will also be included in admissions, staff induction packs, volunteer registration, and visitor sign-in documentation as appropriate.

Automated / Profiling & Decision-Making

At present, the school does not carry out any automated decision-making or profiling which produces legal or similarly significant effects for individuals. Should this change, we will:

- Notify relevant individuals describing the logic involved, the significance and envisaged consequences;
- Where required, seek consent or provide mechanisms for human review / appeal.

Data Sharing, Third-Party Processors & Data Transfers Outside UK

- Where we engage external service providers (e.g., MIS providers, cloud services, IT support, catering, transport), we ensure a written agreement / data processing contract is in place, obliging them to comply with UK GDPR and DPA 2018 standards.
- We do not routinely transfer personal data outside the UK. If we ever do so (e.g., cloud hosting, third-party services), we will ensure adequate safeguards are in place,

and record such transfers.

- We share personal data with external agencies only as necessary, e.g., local authorities, DfE, exam boards, health or welfare agencies, safeguarding or legal authorities — and only the minimum required data.

Data Breach Management & Security Incident Reporting

- The school has procedures in place to detect, report and investigate any personal data breach.
- In the event of a breach which poses a risk to individuals' rights and freedoms, we will report
- to the ICO where required, and notify affected individuals as appropriate.
- All staff are required to report any suspected or actual data breach immediately to the School Data Processing Lead.

Accountability, Oversight & Review

- We maintain a Record of Processing Activities (RoPA) covering all categories of processing we carry out. This supports accountability and compliance.
- We review this policy at least annually, or whenever there is a significant change in processing (e.g. new IT system, CCTV, external provider, change in law).
- All staff, governors, volunteers and relevant stakeholders will receive periodic training or briefing on data protection responsibilities, including data minimisation, security, confidentiality, consent, and data subject rights.
- The DPO will monitor compliance, provide advice, and coordinate responses to any data-subject requests, complaints or breaches.

How to Make a Request, Raise a Concern or Withdraw Consent

If you wish to:

- access data we hold about you (or your child)
- request correction or erasure
- withdraw consent for processing (e.g., photos, extra-curricular activities)
- object to processing or request restriction or portability
- lodge a complaint about how your data has been handled

... please send your request in writing to the Data Protection Officer (contact details above). Please include your name, contact details, and specify clearly what request or concern you are making.

If this does not resolve your concern, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

Publication & Review of This Notice

- This Privacy Notice will be published on the school website, and also made available in hard copy on request.
- All new pupils, parents/carers, staff, volunteers and visitors will be informed of this notice (e.g., via induction packs, sign-in forms, admissions procedures, staff induction, volunteer registration).
- We will reissue or notify the school community of any substantial changes (e.g., new processing activities, system changes, legal changes).

St Hilda's CE High School – Pupil Privacy Notice

We are St Hilda's CE High School. We take your privacy seriously and want you to know how we use the information we hold about you.

We are the Data Controller, which means we are responsible for keeping your information safe and using it properly.

Our Data Protection Officer is:

Name: Judicium Education

Contact: 0345 548 7000 / enquiries@judicium.com

Address: Judicium HQ, 98 Theobalds Road, London, WC1X 8WB Our School Data Protection Lead

Name: K Kearns

Contact: 0151 733 2709 / kkearns@st-hildas.co.uk

If you have any questions or concerns about how we handle personal data, please contact the School Data Protection Lead in the first instance.

What information we collect about you

We may collect and use the following types of information:

- Your name, address, date of birth, and contact information
- Your attendance, behaviour, and rewards
- Your exam and assessment results, reports, and progress
- Special educational needs or medical information
- Safeguarding and wellbeing information
- Photographs or videos (e.g., for school events, yearbooks, website)
- IT logins and online learning activity
- Participation in clubs, trips, or extra activities

We only collect information that is necessary to support your learning, wellbeing, and safety.

Why we collect your information

We use your information to:

- Help you learn and track your progress
- Keep you safe and support your wellbeing
- Organise school trips, events, and extra activities
- Communicate with your parents or carers
- Meet legal requirements, for example reporting to the government or exam boards
- Improve our school services and facilities

Sometimes, we also use your information if you have given us **permission**, for example, using your photograph in school materials. You can **change your mind** at any time.

Who we share your information with

We sometimes share your information with:

- Your parents or carers
- Teachers and school staff
- Local authorities and the Department for Education (DfE)
- Exam boards and regulators
- Health professionals like school nurses
- External providers helping with school services (e.g., IT support, trips, clubs)
- Other schools if you move or attend joint activities

We only share the information that is necessary, and we make sure it is kept safe.

How we keep your information safe

We store your information securely, both on computers and on paper. Only staff who need your information to do their job can see it.

We keep information **only as long as we need it**, and safely destroy it when we no longer need it.

Your rights

You have rights about the information we hold about you:

- To see what information, we have about you
- To correct information if it is wrong
- To ask us to delete information in some cases
- To limit how we use your information in some cases
- To object to certain uses of your information
- To withdraw consent at any time (for example, if you no longer want to appear in a photo)
- To ask for a copy of your information in a common electronic format If you want to use any of these rights, ask a teacher or contact our DPO.

You can also complain to the **Information Commissioner's Office (ICO)** if you think we are not handling your information properly.

Using our website and online tools

When you use our website or online tools, we may collect:

- Your device information (like IP address or browser)
- How you use the site or learning platform
- Cookies to help the website work better

Our **Cookie Policy** explains this in more detail.

Changes to this notice

We may update this notice if things change, like new systems or new laws. We will let you know if something important changes.

Who to ask for help

If you have questions, want to see your information, or need help, you can talk to:

Our School Data Protection Lead

Name: K Kearns

Contact: 0151 733 2709 / kkearns@st-hildas.co.uk

Or you can ask a teacher, form tutor, or school office staff to help you.