

St Cuthbert Mayne School



Student and Parent Privacy Notice

Last reviewed: 15.10.26

Next review date: 14.10.27

1. Introduction

St Cuthbert Mayne School is committed to protecting the privacy and security of the personal information we hold about our pupils and their parents or carers.

This privacy notice explains how we collect, use, store and share personal information about pupils who attend our school, including information provided by parents and carers. It also explains how we use contact and other relevant information about parents, carers and other individuals who have responsibility for, or are involved in, a pupil's education and welfare.

The notice applies to current pupils, prospective pupils and, where relevant, former pupils and their families.

The school processes personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable legislation.

This notice explains:

- What personal information we collect and hold.
- Why we collect and use your information.
- The lawful bases on which we process your information.
- Who we may share your information with.
- How we store and protect your information.
- How long we retain your information.
- Your rights in relation to your personal information and how to exercise them.

We recognise that much of the information we hold relates to children and young people. We take particular care to ensure that their personal information is handled lawfully, fairly and securely, with appropriate regard for their rights, privacy and welfare.

This notice may be updated from time to time to reflect changes in legislation, guidance or our data processing arrangements.

2. Who is responsible for your personal information?

St Cuthbert Mayne School is the data controller for the personal information it processes about pupils and their families, unless responsibility for a particular processing activity rests with another organisation.

As data controller, the school determines why and how personal information is processed and is responsible for ensuring that processing complies with data protection legislation.

In carrying out our responsibilities, we work with relevant organisations, including Devon County Council, the Department for Education, healthcare professionals and other services involved in education, safeguarding and pupil welfare.

The precise responsibilities of each organisation depend on the service being provided and the relevant legal, contractual and data protection arrangements.

Contact

You can contact the Data Protection Link Officer at the school, if you have questions about how the school uses your personal information or if you wish to raise a concern about data protection. The school outsources its Data Protection Officer service to Devon County Council.

Data Protection Link Officer	Data Protection Officer
Matt Burrell St. Cuthbert Mayne Trumlands Road Torquay Devon TQ1 4RN Email: gdpr@stcm.school	Jenny Goodall School Data Protection Team Devon County Council Topsham Road Exeter EX2 4QD Email: jenny.goodall@devon.gov.uk

3. What personal information do we collect?

The personal information we collect and hold will depend on the pupil's age, circumstances, educational needs and the services provided by the school.

It may include the following categories.

Pupil identification and contact information

- Full name, preferred name and previous names, where applicable.
- Date of birth and gender.
- Preferred pronouns, where provided.
- Home address and contact details.
- Unique Pupil Number and other relevant identification numbers.

- Nationality and country of birth, where required for educational or statutory purposes.
- Admission and enrolment information.
- Facial photograph and other images, where appropriate.
- Information about the pupil's previous schools and educational history.

Parent, carer and family information

We collect information about parents, carers and other individuals where necessary to administer admissions, communicate with families, support pupils and meet our legal responsibilities.

This may include:

- Names, addresses, telephone numbers and email addresses.
- Relationship to the pupil.
- Parental responsibility information, where relevant.
- Details of individuals authorised to collect a pupil or act as emergency contacts.
- Information about court orders, contact restrictions or other arrangements affecting a pupil, where necessary.
- Emergency contact information.
- Information about family circumstances where relevant to the pupil's education, welfare or safeguarding, where applicable.
- Communication preferences and records of contact with the school.

We will only collect and use family information that is relevant and necessary for a legitimate school purpose.

Educational and academic information

We collect and maintain information about pupils' education and progress, including:

- Current and previous school placements.
- Academic assessments and examination results.
- Progress reports and attainment data.
- Curriculum choices and subject options.
- Coursework and other assessed work.
- Examination entries, access arrangements and results.
- Attendance and punctuality.
- Behaviour, rewards and sanctions.
- Exclusions and other relevant disciplinary records.
- Educational visits, trips and extracurricular activities.
- Careers education, work experience and post school destinations, where applicable.
- Reports and information received from previous schools or other educational settings.

We use this information to support teaching and learning, monitor progress, identify additional needs and meet statutory reporting requirements.

Special educational needs and disability information

Where relevant, we process information about a pupil's special educational needs, disabilities and additional learning requirements.

This may include:

- Special educational needs assessments.
- Education, Health and Care Plans.
- Information about learning difficulties or disabilities.
- Reports from educational psychologists and other specialists.
- Support plans and records of interventions.
- Reasonable adjustments and access arrangements.
- Information about specialist equipment or additional support.
- Correspondence with parents, carers and external professionals.
- Records of reviews and assessments of educational needs.

We use this information to identify and meet pupils' needs, provide appropriate support and comply with our legal responsibilities.

Information about a pupil's health or disability may constitute special category personal data and is subject to additional legal protections.

Medical and health information

We may hold information about pupils' health and medical needs, including:

- Relevant medical conditions and diagnoses
- The name of the medical practice or surgery, where applicable.
- Allergies and dietary requirements.
- Medication and arrangements for administering it.
- Emergency medical information.
- Medical advice and healthcare plans.
- Vaccinations, where applicable.
- Information about injuries, accidents and illnesses occurring at school.
- Information about mental health and wellbeing, where relevant.
- Reports or advice from healthcare professionals.
- Information required to support safe participation in lessons, physical education, trips and other activities.

We use this information to safeguard pupils, respond to medical emergencies, provide appropriate support and make suitable arrangements for their participation in school life.

Access to medical information is restricted to individuals who need it for an appropriate purpose.

Safeguarding and welfare information

The school has a responsibility to safeguard and promote the welfare of children and young people. Where necessary, we process personal information to identify concerns, provide support and protect pupils from harm.

This may include:

- Safeguarding concerns and referrals.
- Records of discussions with pupils, parents and carers.
- Information about welfare and wellbeing.
- Records of child protection meetings and plans.
- Information received from social care, the police and other safeguarding agencies.
- Information about domestic abuse, neglect or other risks to a child's welfare.
- Records of bullying, harassment or other concerns affecting pupils.
- Information about online safety and relevant incidents.
- Information relating to allegations or investigations where necessary.
- Records of actions taken and support provided.

Safeguarding information may be sensitive and may need to be shared with relevant agencies where necessary to protect a pupil or another individual.

We handle such information carefully, restrict access where appropriate and retain it in accordance with applicable legal requirements and the school's retention arrangements.

Behaviour, attendance and pastoral information

We collect information to support pupils' behaviour, attendance, engagement and personal development.

This may include:

- Attendance registers and absence records.
- Reasons for absence, where provided.
- Late arrival and punctuality records.
- Behaviour incidents and actions, including statements.
- Rewards, achievements and positive behaviour records.
- Pastoral support and intervention records.
- Mobile phone exemptions.
- Information about peer relationships and friendship concerns.
- Records of meetings with pupils and families.
- Information about support provided to improve attendance or behaviour.
- Relevant correspondence with external agencies.

We use this information to support pupils, identify concerns, promote positive behaviour and fulfil our responsibilities for education and welfare.

Assessment, examination and statutory information

We process information necessary to administer assessments, examinations and statutory educational requirements.

This may include:

- Internal and external assessment results.

- Public examination entries and results.
- Examination access arrangements.
- Information required by examination boards.
- Statutory assessment information.
- Pupil premium and other relevant funding information.
- Information required for educational performance reporting.
- Information submitted through statutory education data collections.

We use this information to assess progress, support pupils' educational development and comply with applicable reporting requirements.

Financial and administrative information

Where relevant, we may process information relating to:

- School meal arrangements and dietary requirements.
- Payments for trips, visits, activities and other services.
- Refunds and payment queries.
- Eligibility for free school meals.
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- Pupil premium eligibility and related funding.
- Financial assistance or support provided to families.
- Information needed to administer school services.

Financial information is handled securely and only used for the relevant administrative, financial or statutory purpose.

Photographs, video and communications

We may use photographs, video recordings and other images of pupils for legitimate school purposes, including:

- Pupil identification and internal school administration.
- Recording educational activities and achievements.
- School displays and newsletters.
- Publications, adverts and other publicity.
- The school website and official social media channels.
- Promoting school activities and celebrating achievements.
- Safeguarding and security, where applicable.

Where required, we will seek permission or consent for particular uses of photographs or recordings. The appropriate approach depends on the purpose, the legal basis for processing and the circumstances.

We will explain where an image may be used publicly and respect relevant restrictions and objections.

We may also retain records of communications with pupils and families, including emails, letters, telephone notes and messages sent through school systems.

Information technology and security

We may collect information generated through pupils' use of school systems and services, including:

- School account details and usernames.
- Access to school email, learning platforms and digital services.
- Records of the use of school devices and networks.
- Biometric information, for school meal purchases, where applicable.
- Information necessary to administer accounts and provide technical support.
- Security logs and information relating to suspected misuse.
- CCTV footage and access records, where applicable.

Any monitoring must be lawful, necessary and proportionate, with appropriate regard for pupils' privacy and welfare.

4. Where do we obtain your personal information?

We collect personal information from a variety of sources, including:

- Directly from pupils.
- From parents, carers and other individuals with relevant responsibility for a pupil.
- From admission forms and other school documentation.
- From previous schools and educational settings.
- From teachers, school leaders and other members of staff.
- From healthcare professionals and other specialists, where appropriate.
- From Torbay Council, Devon County Council and other relevant public authorities.
- From social care, the police and other safeguarding agencies, where necessary.
- From the Department for Education and other relevant education bodies.
- From examination boards and assessment providers.
- From organisations providing school services, learning platforms and educational technology.
- From information generated through a pupil's attendance, learning and participation in school activities.

Where we obtain personal information from another source, we will provide any additional privacy information required by data protection legislation.

In safeguarding situations, information may be shared with the school by another organisation or individual where necessary to protect a child, even where the pupil or parent has not provided it directly.

5. Why do we use your personal information?

We process personal information to provide education, support pupils' development, safeguard their welfare and meet our legal and operational responsibilities.

Our purposes include the following.

Admissions and pupil administration

We use personal information to:

- Process applications and manage admissions.
- Maintain accurate pupil records.
- Verify pupil identity and relevant admission information.
- Communicate with parents, carers and pupils.
- Manage transfers between schools.
- Maintain emergency contacts and collection arrangements.
- Administer school services and activities.

Teaching, learning and educational progress

We use personal information to:

- Plan and deliver teaching and learning.
- Assess attainment and monitor progress.
- Identify pupils who may require additional support.
- Provide feedback and report progress to parents and carers.
- Administer examinations and assessments.
- Support curriculum planning and educational improvement.
- Meet statutory educational reporting requirements.
- Support careers education and preparation for further education, training or employment.

Special educational needs and additional support

We use personal information to:

- Identify and assess additional educational needs.
- Develop and review support plans.
- Implement reasonable adjustments and access arrangements.
- Work with parents, carers and external professionals.
- Support applications for assessments or specialist provision.
- Meet our duties under relevant education and equality legislation.

Attendance and behaviour

We use personal information to:

- Monitor attendance and punctuality.
- Investigate unexplained or persistent absence.
- Promote regular school attendance.
- Manage behaviour and disciplinary matters.
- Recognise achievements and positive contributions.
- Identify patterns of concern.
- Provide pastoral support and appropriate interventions.
- Work with families and external agencies where necessary.

Safeguarding and pupil welfare

We use personal information to:

- Safeguard and promote the welfare of children.
- Identify and respond to concerns about a pupil's safety or wellbeing.
- Make referrals to appropriate services.
- Work with social care, the police and other relevant agencies.
- Maintain safeguarding records.
- Respond to allegations, incidents and other concerns.
- Meet our statutory safeguarding responsibilities.

Health, medical needs and wellbeing

We use personal information to:

- Manage medical needs and allergies.
- Administer medication where appropriate.
- Respond to medical emergencies.
- Arrange suitable support and adjustments.
- Manage health and safety risks.
- Support pupils' physical and mental wellbeing.
- Ensure that pupils can participate safely in school activities.

School trips and extracurricular activities

We use personal information to:

- Organise educational visits, trips and activities.
- Assess relevant medical, safeguarding and accessibility needs.
- Obtain and record permissions where required.
- Make appropriate supervision and safety arrangements.
- Contact parents or carers in an emergency.
- Administer payments and other practical arrangements.

Communication with families

We use personal information to:

- Send school notices and updates.
- Share reports about progress, attendance and behaviour.
- Contact parents and carers about welfare or safeguarding matters.
- Respond to enquiries and concerns.
- Arrange meetings and appointments.
- Communicate about school events, activities and changes to arrangements.

Funding, administration and statutory reporting

We use personal information to:

- Administer relevant funding and financial support.
- Establish eligibility for services and benefits where applicable.
- Submit required educational data returns.
- Meet statutory reporting obligations.
- Produce management information and statistics.
- Support school planning, evaluation and improvement.

Legal and regulatory responsibilities

We use personal information to:

- Comply with applicable legislation.
- Respond to lawful requests from public authorities and regulators.
- Manage complaints and disputes.
- Maintain records required by law.
- Investigate incidents and suspected wrongdoing.
- Establish, exercise or defend legal claims.

We will only use personal information for purposes that are lawful and compatible with the reasons for which it was collected, unless we have a valid legal basis for further processing.

6. What is our lawful basis for processing your information?

Data protection legislation requires us to have a lawful basis for processing personal information. The appropriate basis depends on the information involved and the purpose for which it is used.

The lawful bases most likely to apply to pupil and parent information are set out below.

Legal obligation

We process personal information where necessary to comply with legal obligations, including requirements relating to:

- Pupil admissions and educational records.
- School attendance.
- Safeguarding and child protection.
- Special educational needs and disability.
- Health and safety.
- Statutory assessment and educational reporting.
- Equality and other applicable legal duties.

Public task

Where applicable, we process personal information where necessary to perform a task carried out in the public interest or in the exercise of official authority vested in the school.

This may include delivering education, supporting pupils' learning and development, maintaining educational records and carrying out relevant statutory functions.

The use of this basis will depend on the particular activity and the legal function being performed.

Contract

In limited circumstances, we may process personal information where necessary to enter into or perform a contract with a parent, carer or other individual, for example in relation to a particular service or arrangement.

Contract is not the principal lawful basis for most of the school's statutory educational activities.

Legitimate interests

In some circumstances, we may process personal information where necessary for our legitimate interests or those of a third party, provided that these interests are not overridden by the rights and freedoms of the individual concerned.

This may apply to certain administrative, communication or operational activities where another lawful basis is not more appropriate.

Where we rely on legitimate interests, we will consider whether the processing is necessary and proportionate and whether the individual's interests or fundamental rights require greater protection.

Vital interests

In limited circumstances, we may process personal information where necessary to protect the vital interests of a pupil or another person, particularly in an emergency involving a risk to life or serious harm.

Consent

In certain circumstances, we may ask for consent to use personal information for a specific purpose.

For example, consent may be appropriate for particular uses of photographs or recordings where another lawful basis does not apply.

Where we rely on consent, it must be freely given, specific, informed and capable of being withdrawn. We will not rely on consent where it is not an appropriate lawful basis, including where processing is necessary to meet a statutory duty.

Where a pupil is a child, we will consider their age, understanding and the circumstances when determining how consent should be obtained and whose agreement is appropriate.

Withdrawing consent will not affect the lawfulness of processing carried out before withdrawal. We may also continue to process information where another lawful basis applies.

Special category personal information

Some information, including health information, ethnic origin, religious beliefs and certain other sensitive information, is classified as special category personal data.

In addition to a lawful basis under Article 6 of the UK GDPR, we must identify an applicable condition under Article 9 and, where required, the Data Protection Act 2018.

Depending on the circumstances, these may include processing necessary for substantial public interest, the provision of health or social care, employment or social protection law where applicable, the establishment, exercise or defence of legal claims, or the protection of vital interests.

We will only process special category information where the relevant legal requirements are met.

Criminal offence information

Where we process information about criminal convictions, offences or related safeguarding matters, we must have an appropriate lawful basis and meet the additional requirements of data protection legislation.

This may include processing necessary to safeguard children, meet legal obligations or respond to relevant safeguarding concerns.

Where required, we maintain an appropriate policy document explaining how relevant special category and criminal offence information is handled and retained.

7. Who do we share your personal information with?

We only share personal information where there is a lawful and appropriate reason to do so. We will share only the information necessary for the relevant purpose and will take appropriate steps to protect it.

Depending on the circumstances, recipients may include:

- Torbay Council, Devon County Council, including relevant education, admissions, attendance, safeguarding and support services.
- The Department for Education.
- The Standards and Testing Agency and other relevant education bodies.
- Examination boards and assessment providers.
- Other schools and educational settings, including when a pupil transfers.
- Social care services and other safeguarding agencies.
- The police and emergency services, where necessary and lawful.
- Healthcare professionals and relevant health services.

- Educational psychologists and other specialists supporting pupils.
- The Special Educational Needs and Disabilities Tribunal or other relevant bodies, where applicable.
- Organisations providing school meals, transport, educational visits and other school services.
- Providers of school management systems, learning platforms and other information technology services.
- External auditors, inspectors and regulators.
- Legal advisers and other professional advisers.
- Courts, tribunals and other public authorities where disclosure is required or authorised by law.

We may also share information with other organisations where necessary to protect a pupil or another individual, investigate suspected wrongdoing, manage legal claims or meet our statutory responsibilities.

Sharing information with parents and carers

We communicate with parents and carers about pupils' education, progress, attendance, behaviour, welfare and other relevant matters.

However, access to a pupil's personal information is subject to applicable law and the circumstances of the case. Parental responsibility does not automatically provide an unrestricted right to access every record relating to a child.

When responding to a request for information, we will consider parental responsibility, the pupil's age and understanding, the nature of the information, the rights and interests of the pupil and any other individuals, and any relevant safeguarding or legal considerations.

Where appropriate, we may need to seek the pupil's views or take account of their wishes and confidentiality.

Sharing information with other schools

When a pupil transfers to another school or educational setting, we may share relevant educational, attendance, safeguarding and other information to support continuity of education and meet our legal responsibilities.

This may include information needed to safeguard the pupil, support additional educational needs and ensure that appropriate arrangements are in place at the receiving setting.

Sharing information with the Department for Education and other public bodies

The school is required to provide certain information to the Department for Education and other relevant public bodies for statutory reporting, funding, planning, monitoring and other authorised purposes.

Information may also be shared where required by law or where an appropriate legal basis applies.

We will not routinely share pupil or parent personal information with organisations for their own unrelated marketing purposes.

8. Will your information be transferred outside the United Kingdom?

Some of the systems and service providers used by the school may store or process information outside the United Kingdom or allow access to information from another country.

Where personal information is transferred outside the United Kingdom, we will ensure that the transfer complies with applicable data protection legislation. This may involve relying on UK adequacy regulations, appropriate safeguards or another lawful transfer mechanism.

Where required, we will provide further information about the relevant transfer arrangements.

9. How do we protect your personal information?

We take appropriate technical and organisational measures to protect personal information against unauthorised access, accidental loss, destruction, alteration or disclosure.

These measures include, where appropriate:

- Restricting access to personal information to authorised individuals.
- Using password protection, access controls and other security measures.
- Maintaining secure electronic and paper records.
- Providing staff with data protection and information security guidance.
- Using appropriate contractual arrangements with external service providers.
- Applying procedures for the secure sharing and disposal of information.
- Taking additional care with safeguarding, medical and other sensitive records.
- Investigating suspected personal data breaches and taking appropriate action.

Pupil and family information is only accessible to individuals who need it to carry out their responsibilities.

We expect staff and other authorised individuals to handle personal information confidentially and in accordance with the school's policies and procedures.

No system can be guaranteed to be completely secure. However, we take our responsibilities seriously and will respond appropriately to any suspected or confirmed personal data breach.

10. How long do we keep your personal information?

We retain personal information only for as long as necessary for the purposes for which it was collected, taking account of our legal obligations, educational requirements and any relevant limitation periods.

Different types of information are retained for different periods. For example, admission records, educational records, examination information, attendance records, safeguarding files, medical information and financial records may all have different retention requirements.

Our retention arrangements are informed by the school's records retention schedule and, where relevant, guidance issued by Devon County Council and other appropriate bodies.

Some pupil records may need to be retained after a pupil leaves the school, particularly where they relate to safeguarding, statutory educational requirements or other legal obligations.

When personal information is no longer required, we will securely destroy it or anonymise it where appropriate.

In some circumstances, we may need to retain information for longer, for example where it is required for a legal claim, an investigation or a statutory obligation.

If you require further information about the retention period applicable to a particular category of pupil or parent information, please contact the school or the Data Protection Officer.

11. What are your data protection rights?

Under data protection legislation, individuals have a number of rights in relation to their personal information. These rights are subject to certain conditions and exemptions.

Right to be informed

You have the right to receive clear information about how your personal information is collected and used. This privacy notice provides that information.

Right of access

You have the right to request a copy of the personal information the school holds about you. This is known as a subject access request.

A parent or carer may be able to make a request on behalf of a child, depending on the circumstances. However, parents do not automatically have an unrestricted right to access all personal information held about their child.

We will consider the child's age, understanding, wishes and rights, together with parental responsibility, safeguarding considerations and the rights of other individuals.

Right to rectification

You have the right to ask us to correct inaccurate personal information and, where appropriate, to complete information that is incomplete.

Right to erasure

In certain circumstances, you have the right to request the deletion of personal information. This right does not apply in every situation, particularly where the school needs to retain information to meet a legal obligation or perform a public task.

Right to restrict processing

In certain circumstances, you can ask us to restrict the use of your personal information while a concern about its accuracy or use is considered.

Right to data portability

In certain circumstances, you may have the right to receive personal information you have provided to us in a structured, commonly used and machine readable format, or to request that it is transferred to another organisation.

This right applies only to certain types of processing and will not apply to most information processed by the school as part of its statutory educational functions.

Right to object

You have the right to object to certain processing activities, including processing carried out on the basis of legitimate interests or public task.

Whether we must stop processing will depend on the circumstances, the lawful basis involved and any applicable legal obligations.

Rights relating to automated decision making

You have rights in relation to certain solely automated decisions that have legal or similarly significant effects on you, including relevant decisions involving profiling.

The extent of these rights depends on the circumstances and the applicable legal requirements.

Exercising your rights

If you wish to exercise any of your rights, or if you have questions about how your information is used, please contact the school or the Data Protection Officer using the details provided in this notice.

We may need to verify your identity and, where a request is made on behalf of a child, establish your authority to act on the child's behalf.

We will respond within the timescales required by data protection legislation. In some circumstances, we may be unable to fulfil a request in full because an exemption applies or because we have a legal obligation to retain or process the information.

12. Is providing personal information compulsory?

Some personal information is necessary for us to admit pupils, provide education, maintain accurate records, safeguard children and meet our legal obligations.

Where you do not provide information that is necessary for these purposes, we may be unable to complete a particular process or provide a service effectively.

Where providing information is optional, we will explain this where appropriate and make clear the consequences of not providing it.

We will not ask for consent where the school is required or otherwise legally entitled to process information without it.

13. Will your personal information be used for automated decisions?

The school does not routinely make decisions about pupils or parents solely through automated processing that produce legal or similarly significant effects.

If this changes, we will provide appropriate information about the processing, the reasons for it, the likely consequences and your relevant rights before introducing the arrangement, where required by law.

14. What should you do if you have a concern?

If you have concerns about how your personal information is being collected, used, stored or shared, you should contact the school or the Data Protection Officer in the first instance.

We will consider your concern and respond in accordance with our procedures.

You also have the right to complain to the Information Commissioner's Office (ICO), which is the independent regulator responsible for data protection in the United Kingdom.

Information about how to raise a concern is available on the ICO website:

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

You can also find further information about your data protection rights and the responsibilities of organisations on the ICO website:

<https://ico.org.uk/>

15. Changes to this privacy notice

We may review and update this privacy notice from time to time to reflect changes in legislation, regulatory guidance, school procedures or the way we process personal information.

The latest version will be made available through the school's usual communication channels, including the school website where appropriate.

Where a significant change affects how we use personal information, we will take appropriate steps to bring that change to the attention of pupils and their parents or carers, as appropriate.

If you have any questions about this notice, please contact the school or the Data Protection Officer.