



Privacy Notice for Parents and Carers

How we use pupil and parent/carers information

Version	September 2026
Next review	September 2027
Data Controller	St Thomas Aquinas Catholic Multi-Academy Trust

This notice explains how the Trust collects, uses, stores and shares personal information about pupils and, where relevant, their parents and carers.

1. Who we are

St Thomas Aquinas Catholic Multi-Academy Trust (the Trust) is the data controller for personal information processed by the Trust and its academies.

Registered/central office: Unit 5, Charnwood Edge Business Park, Cossington, Leicestershire, LE7 4UZ

Telephone: 0116 296 8171

Website: <https://www.aquinas-cmat.org>

Our Data Protection Officer (DPO) is Antoinette Bouwens. Questions about this notice or the way we use personal information can be sent to: dpo@aquinas-cmat.org or to the address above.

2. Who this notice applies to

This notice primarily explains how we use personal information about pupils. It also covers personal information about parents, carers and other authorised contacts where we process their information in connection with a pupil, for example contact details, correspondence, parental responsibility, emergency contacts and payment information.

Children have their own data protection rights. Where a child is able to understand and exercise those rights, we will take their views and rights into account.

3. The information we collect and use

Depending on the pupil, academy and services used, we may process the following categories of information:

- personal identifiers and contact details, such as name, address, date of birth, unique pupil number, pupil identifiers and emergency contacts;
- parent/carers and authorised contact information, including names, contact details, parental responsibility and correspondence;
- characteristics and equality information, such as ethnicity, language, religion and free school meal eligibility;
- admissions and previous education information;
- attendance information, including sessions attended, absences, reasons for absence and previous schools;
- assessment, attainment, curriculum, examination and progress information;
- behaviour, suspension, permanent exclusion and alternative provision information;
- special educational needs and disabilities (SEND), support plans and related information;
- safeguarding information, including professional involvement, court orders and concerns;
- medical, health and welfare information, including allergies, medication, dietary requirements and care plans;
- trips, visits, extracurricular activities, transport and participation records;
- catering, free school meal and payment information where relevant;
- photographs, video and audio recordings where appropriate;
- CCTV images and associated security records;
- IT, online learning, account, authentication and system-use information; and
- other information needed to educate, safeguard and support pupils or to run the Trust and its academies lawfully and effectively.

Some of this information is special category personal data and requires additional protection. This may include information about health, ethnicity, religion or biometric data where biometric recognition technology is used. Criminal offence information may also be processed where necessary and lawful.

4. Why we collect and use personal information

- provide education and support pupil learning;
- monitor and report on attainment, progress, attendance and behaviour;
- provide pastoral, SEND, medical and welfare support;
- safeguard pupils and others and respond to emergencies;
- administer admissions, transfers, examinations, trips, activities, catering and other school services;
- communicate with pupils, parents, carers and authorised contacts;
- operate and secure our sites, systems and information, including appropriate use of CCTV;
- manage payments and financial administration connected with school services;
- assess and improve the quality and effectiveness of our services;
- carry out appropriate research, analysis and statistical reporting;
- meet statutory duties, including required Department for Education (DfE) data collections; and
- comply with legal, regulatory, safeguarding and accountability requirements.

5. Our lawful bases

Under Article 6 of the UK General Data Protection Regulation (UK GDPR), we rely on one or more of the following lawful bases, depending on the purpose of the processing:

- Article 6(1)(c), legal obligation: where processing is necessary for us to comply with the law;
- Article 6(1)(e), public task: where processing is necessary to perform our functions in the public interest or in the exercise of official authority;
- Article 6(1)(d), vital interests: in limited circumstances where processing is necessary to protect someone's life;
- Article 6(1)(a), consent: where we ask for freely given consent for a particular optional use of information; and
- Article 6(1)(f), legitimate interests: only where this basis is available and appropriate, and after balancing our interests against the individual's rights and interests.

The specific lawful basis depends on the activity and the legislation that applies to it. Our records of processing activities identify the relevant purpose, lawful basis and supporting legislation for each processing activity.

6. Special category and criminal offence information

Where we process special category personal data (e.g., health, ethnicity, religion, or biometrics), we identify an appropriate condition under Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018:

- Article 9(2)(a) – Explicit Consent.
- Article 9(2)(c) – Vital Interests.
- Article 9(2)(g) – Reasons of Substantial Public Interest (e.g., statutory safeguarding, equality monitoring, or supporting pupils with disabilities).
- Article 9(2)(h) – Health or Social Care (e.g., medical support and care planning).
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Where we process criminal offence information, we do so strictly where permitted under Article 10 UK GDPR and Schedule 1 of the Data Protection Act 2018.

7. Biometric information

Some of our academies use biometric recognition systems for specified purposes, such as access to catering or other services.

In accordance with Section 26 of the Protection of Freedoms Act 2012:

- We will notify parents/carers and obtain written parental consent before processing a child's biometric data.
- Pupils and parents/carers have the absolute right to object or refuse consent.
- Where consent is not given or is withdrawn, we will provide an alternative, non-biometric method (such as a PIN number or smart card) without any disadvantage to the pupil.

Ordinary photographs and CCTV images are not treated as biometric special category data unless they are processed using specific technology for the purpose of uniquely identifying a person.

8. How we collect information

We collect information directly from pupils and parents/carers and may also receive it from:

- previous or other educational settings;
- local authorities and government departments or agencies;
- health professionals and NHS bodies;
- social care and safeguarding partners;
- police, courts and tribunals;
- examination and awarding bodies;
- education, careers and youth support services; and
- other professionals or organisations involved in a pupil's education, support, welfare or safeguarding.

Pupil information is essential to the operation of our academies. Much of the information we request is mandatory, but some is voluntary. When we collect information, we will clearly state whether provision is compulsory or optional, alongside the consequences of not providing it.

9. How long we keep information and how we protect it

We keep personal information only for as long as it is needed for the purpose for which it was collected, or for as long as we are required to keep it. Different records have different retention periods.

We use appropriate organisational and technical measures to protect personal information against accidental or unlawful loss, alteration, disclosure or access. When information is no longer required, we dispose of it securely.

10. Who we share information with

We only share personal information where there is a lawful basis to do so. Depending on the circumstances, we may share information with:

- other schools, academies, colleges or post-16 providers a pupil attends or transfers to;
- local authorities and youth support or careers services where applicable;
- the Department for Education (DfE), the Education and Skills Funding Agency and other relevant government bodies;

- Ofsted and other regulators or statutory bodies;
- NHS organisations, school nursing, immunisation and other health services;
- social care, safeguarding partners and other agencies involved in protecting children;
- police, courts, tribunals and other law-enforcement bodies where lawful;
- examination boards and awarding organisations;
- professional advisers, auditors and consultants;
- contracted suppliers and service providers, including IT, communications, catering, payment, educational and administrative services; and
- charities and voluntary organisations where appropriate and lawful.

Where an organisation processes personal data on our behalf, we put appropriate contractual and data protection arrangements in place.

11. Department for Education and the National Pupil Database

The DfE collects personal information from schools, academy trusts, local authorities and other organisations through statutory data collections. We are required to provide specified pupil information to the DfE where legislation requires this.

Information supplied to the DfE may be held in the National Pupil Database (NPD). The DfE uses information for purposes including funding, education policy, school accountability, research and statistics, and may share information from the NPD where the law permits and its data-sharing controls are satisfied.

Further information about how the DfE uses personal information and the National Pupil Database is available on GOV.UK: <https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

12. International transfers

Where third-party suppliers or cloud platform servers process or store data outside the United Kingdom, we ensure appropriate safeguards are implemented in compliance with UK GDPR.

These mechanisms include:

- Transferring to countries recognized under UK Adequacy Regulations.
- Standard contractual clauses using the UK International Data Transfer Agreement (IDTA) or UK Addendum.
- Supplier certification under approved frameworks (e.g., the UK Extension to the EU-U.S. Data Privacy Framework).

13. Consent, photographs and communications

Where processing relies on consent (e.g., optional photographic promotional materials or opt-in electronic marketing), we will explain the use and obtain clear consent. Consent can be withdrawn at any time by contacting the school or DPO. Withdrawal does not affect processing carried out prior to withdrawal.

Routine communications regarding education, attendance, administrative matters, and pupil safety are statutory/administrative and do not require marketing consent.

14. Automated decision-making and profiling

We do not currently make decisions about pupils or parents/carers that have legal or similarly significant effects based solely on automated processing. If this changes, we will provide appropriate privacy information explaining the processing, its significance and the rights available to individuals.

15. Your data protection rights

Depending on the circumstances and the lawful basis used, individuals may have the following rights under data protection law:

- the right to be informed about how personal information is used;
- the right of access to personal information;
- the right to have inaccurate information corrected;
- the right to erasure in certain circumstances;
- the right to restrict processing in certain circumstances;
- the right to data portability where it applies;
- the right to object to processing in certain circumstances;
- rights relating to automated decision-making and profiling; and
- the right to withdraw consent where consent is the lawful basis.

These rights are not absolute and do not all apply in every circumstance. To exercise a right, contact our DPO using the details in section 1.

16. Subject Access Requests for children

The right of access to a pupil's personal data belongs to the pupil. A parent or carer may make a subject access request on a child's behalf where the child is not competent to act independently or where the child has authorised the parent or carer to act for them. We will consider the child's age, understanding, wishes and best interests, together with any applicable exemptions and the rights of other people.

17. Complaints

If you have a concern about our use of personal information, please contact our DPO first so that we can try to resolve it.

Data Protection Officer: Antoinette Bouwens

Email: dpo@aquinas-cmat.org

You also have the right to complain to the Information Commissioner's Office (ICO):

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

Telephone: 0303 123 1113

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

18. Changes to this notice

We review this privacy notice at least annually and whenever there is a significant change to how we use personal information. The current version will be made available through the Trust website.