St Peter & St Paul School

Privacy Notice

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Who we are

St Peter & St Paul School is a non-selective, co-educational independent day school for children aged 4 to 11. We are the data controller for the personal information described in this notice.

Personal information means information that identifies you directly or that can identify you when combined with other information. Examples include names, addresses, photographs, internet protocol (IP) addresses and cookie identifiers.

This notice explains how we collect, use, share and retain personal information about pupils, parents and carers, fee payers, job applicants, current and former staff, trustees, volunteers and visitors. It applies to paper and electronic records. We handle personal information under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended.

For questions, requests or complaints about personal information, contact Duncan Paton – School Business & Development Manager or write to St Peter & St Paul School, Brambling House, Hady Hill, Chesterfield, S41 0EF.

What we collect and how we use it

Parents and children

Admissions

When you enquire about a place, we may ask for your contact details and your child's name, age and current school. When you apply or accept a place, we collect further information, such as addresses, dates of birth, previous schools, emergency contacts, and information about health, dietary needs, special educational needs and disabilities (SEND), or family circumstances where relevant to your child's welfare. We usually obtain information directly from families through forms, meetings and correspondence. We may also receive information from previous schools or professionals supporting your child.

We use this information to respond to enquiries, assess applications, manage admissions and provide education and care. This includes keeping attendance records, monitoring progress, arranging

activities, providing school IT services, supporting pupils with SEND, and communicating with families. If information is required by law or to enter into or perform a contract, we explain what is required and what may happen if it is missing. For example, missing information needed to assess an application may prevent us from completing it.

Financial information

We use fee payer details to administer school fees. If you apply for a bursary, we collect additional financial and household information to assess eligibility and administer any award. The Finance team makes the information available to colleagues who need it to assess eligibility or administer an award. Where relevant, fee payer information may also come from a third party or a previous school.

Statutory returns

We submit the statutory school-level annual census to the Department for Education (DfE). It includes school-level figures such as the number of pupils, staff and pupils with SEND. If we collect ethnicity, language, country of birth or nationality for another purpose, we explain that purpose and the applicable basis when collecting it.

Photographs and videos

We use photographs and videos to record learning and school activities and to share school life with families. Where we rely on consent to publish images on our website, social media or in promotional materials, we explain the intended use. You can withdraw consent by contacting the School. Withdrawal does not affect earlier lawful use. We will stop future use for the purpose covered by that consent and remove images from channels we control where required. Materials already distributed and copies shared by others may be outside our control.

After a pupil leaves, we handle existing images and any future use in accordance with the same consent-based policy, should you wish for images not to be used in the future, consent should be withdrawn when the pupil enrolment ends.

Employment and management of staff

We collect personal information from job applicants, current staff and former staff to recruit safely, administer employment and meet our responsibilities as an employer.

Contractual responsibilities

We record and use information needed to manage employment contracts, such as contact details, dates of birth, next of kin and emergency contacts, recruitment records, academic qualifications and professional registrations. We use salary, bank and pension details to administer pay and benefits.

Statutory responsibilities

We use relevant information to meet our responsibilities for tax, National Insurance, statutory sick pay, maternity and paternity pay and other statutory family leave. We also record identity, entitlement to work in the UK and the results of applicable safer recruitment checks. See the section on criminal offence information for how we handle DBS and related records.

Management responsibilities

We record information that enables us to support the personal development of our staff and to assess their performance. This includes personal development appraisals, performance monitoring, capability, grievance and disciplinary matters, absence and sickness monitoring.

We may also use relevant health information to manage absence and identify reasonable adjustments. Where we collect staff ethnicity or other special category information for a specific purpose, we explain the purpose and applicable conditions.

Collection of staff information

We obtain information directly from applicants and staff. Where appropriate, we also obtain information from referees, professional bodies, identity verification services, the Disclosure and Barring Service or occupational health professionals. We use the lawful basis and additional conditions that apply to the particular check.

Trustees

We use trustee contact and role information to manage appointments and communicate with trustees. We may record next of kin or emergency contact details for safety and use identity and suitability information to carry out applicable checks, including DBS and section 128 checks where applicable.

Volunteers and other visitors to the School

We collect information to manage volunteer roles and contact volunteers or visitors where needed. We may record visitor details and times of entry and departure for security and safeguarding. Where the role requires suitability checks, we process the information needed for those checks.

How we use your information

Educating children and supporting their learning

We keep class registers and use information to organise and monitor activities, provide education and IT services, and assess pupils' academic progress. This can include baseline assessments to track a pupil's learning and progress over time. We also use information about a pupil's individual learning needs or disability to plan and review any special educational provision they need.

Keeping children safe

We record and use relevant information to respond to concerns, provide pastoral support and protect children. Where necessary and proportionate, we may share information with children's social care, the police, health professionals, another school or other safeguarding partners. We may share without consent where the law allows or requires it. Where safe and appropriate, we explain what we share and why.

We monitor attendance and absence and may record relevant information about pupils' personal and social development to provide pastoral care. We hold confidential safeguarding records securely and restrict access to those who need the information for their role or are otherwise entitled to see it.

Staff explain that they may need to pass information about abuse or a welfare concern to the people responsible for keeping the child safe. Where informing a child or family in advance could put someone at risk or prejudice an investigation, we may share the information without prior notice.

When a pupil with a child protection file moves to another school, our Designated Safeguarding Lead transfers it securely and separately from the main pupil record in line with statutory safeguarding guidance. Where the concerns are significant or complex, or children's social care is involved, the Designated Safeguarding Lead will speak to the receiving school's safeguarding lead where needed and share relevant information in advance so they can prepare to protect and support the child.

Communicating with parents of former pupils

We use your contact details to respond to enquiries, provide updates about an application and, where relevant, tell you if a place becomes available in the year group you asked about. Where permitted by data protection and electronic marketing rules, we may also send school news, open morning

invitations or invitations to events for former pupils and their families. You can stop promotional emails using the unsubscribe option or by contacting the School.

Our lawful basis

- Contract. We use information where necessary to enter into or perform a contract with you, for example to administer your school fees or employment. This can include steps you ask us to take before entering into a contract.
- Legal obligation. We use information where necessary to meet duties such as safeguarding, safer recruitment, right-to-work checks, statutory returns, tax and employment reporting.
- Legitimate interests. Where necessary and where the person's interests, rights and freedoms do not override ours, we use information to provide and improve education and pastoral support, administer enquiries and school operations, protect people and property, and communicate with families. We give particular weight to children's rights and interests.
- Vital interests. In an emergency, we may use or share information where necessary to protect someone's life, for example by giving emergency services relevant medical information. If this involves special category data, an additional condition also applies.
- Consent. Where we rely on consent for a specific purpose, such as publishing a pupil's image for promotion, we explain the use and how to withdraw consent. You can withdraw it at any time.

Special category information

Health information and information about racial or ethnic origin or sexual orientation are examples of special category data. We need both an Article 6 lawful basis and an Article 9 condition to use this information.

- Staff health and employment. Where necessary to meet employment law duties or exercise employment rights, such as considering reasonable adjustments or administering statutory sick pay, we rely on Article 9(2)(b) and Schedule 1, paragraph 1 of the Data Protection Act 2018.
- Safeguarding. Where the legal requirements are met, we may rely on substantial public interest under Article 9(2)(g) and the safeguarding condition in Schedule 1, paragraph 18 of the Data Protection Act 2018 to protect a child from harm or protect their wellbeing.

Pupil health and pastoral information

We may record information about a pupil's health for the following purposes.

- Safeguarding. We may record information about a pupil's physical or mental health and share relevant details with health or social care professionals where necessary to safeguard or support the child.
- Pastoral care. We may record information about a pupil's social, psychological or physical development to help identify and provide appropriate support.
- SEND. We may use information about a pupil's individual needs, which can include health information, to plan support and review how it is working.
- Medical and dietary care. We may record existing medical conditions, allergies, dietary needs, and medical incidents at school. We use relevant details to provide appropriate support, respond to incidents and communicate with relevant staff or service providers, such as catering staff, where needed.

Other special category information

At enrolment, we invite families to tell us about their child's ethnic background. If they choose to share it and give consent, we use it to help staff involved in the child's pastoral care understand the background the family wishes to share and inform conversations about the child's cultural identity. We rely on consent under Article 6(1)(a) and explicit consent under Article 9(2)(a) of the UK GDPR. Providing this information is optional and does not affect admission, care or support. Consent can be withdrawn at any time using the contact details in this notice.

Explicit consent

Where we rely on explicit consent under Article 9(2)(a), we explain the particular use and how to withdraw consent.

Criminal offence information and suitability checks

We carry out suitability checks for staff, trustees and volunteers according to their roles. These may include identity checks, references, Disclosure and Barring Service (DBS) checks and section 128 prohibition from management checks. Where the law requires us to carry out a check, we rely on Article 6(1)(c) of the UK GDPR.

Where a check involves criminal offence information, we handle it in accordance with Article 10 of the UK GDPR and the Data Protection Act 2018. We use the employment conditions in Schedule 1, paragraph 1 where necessary to meet legal obligations connected with employment. For other roles, where the relevant conditions are met, we use the statutory purposes condition in paragraph 6 or the safeguarding condition in paragraph 18.

How long we keep information

We retain information for as long as needed for the purpose for which we collected it, taking into account statutory duties, safeguarding requirements and any ongoing investigation, complaint or claim. We keep personal information in line with our Data Retention Schedule. The usual periods for key records are as follows.

- **Admission and attendance registers.** We keep each entry for at least six years from the date it was made. We keep statutory backups for six years after the end of the school year they relate to.
- **Pupil educational files.** We keep these while a pupil attends the School and normally transfer the file to the receiving school when the pupil leaves.
- **Child protection records.** We transfer these separately and securely when a pupil moves school. Where we retain a separate child protection record, we review it when the pupil reaches 25 to decide whether it needs to be kept longer.
- **School copies of examination results.** We keep these for the current year plus six years.
- **Staff recruitment and employment records.** We generally keep unsuccessful applications for six months from the successful candidate's appointment and staff personnel files for six years after employment ends.
- **Invoices and receipts.** We keep these for the current financial year plus six years.

We may keep relevant records for longer where required by law or where they are still needed for safeguarding, an investigation, a complaint or a legal claim. When we no longer need the information, we securely delete, destroy or anonymise it as appropriate. The CCTV section explains how long we keep footage.

Some pupil information, such as pupil roll entries, assessment results and safeguarding records, may be kept after a pupil leaves. Any longer retention for historical, research or statistical purposes is subject to the applicable legal requirements and safeguards.

How and why we share information

Depending on the purpose, we may share relevant information with other schools, local authorities, the DfE, safeguarding or health professionals, emergency services, the police, HMRC, pension providers, insurers and professional advisers.

When a pupil moves school, we may pass relevant records to the receiving school or local authority as appropriate. We may share relevant information with specialists involved in assessing or supporting a pupil's SEND. We provide staff tax and pension information to HMRC and pension providers as applicable.

Suppliers and contractors

We may also share information with suppliers who provide services such as school management systems, payroll, IT or catering. Where a supplier processes personal information on our behalf, we use a written contract that sets out its data protection obligations and requires it to follow our instructions. We use processors that can provide sufficient guarantees about how they protect personal information and share only the information needed for the service.

International transfers

We use cloud services, including Google Workspace, to store and manage school information. Depending on the service, our suppliers or their subcontractors may store or access personal information outside the UK.

Where UK data protection law restricts a transfer, the applicable protection may be UK adequacy regulations or safeguards such as approved contractual clauses. You can contact the School using the details in this notice to find out which arrangements apply and how to obtain a copy of any relevant safeguards.

Your rights and how to complain

You can ask for access to your personal information and for inaccurate or incomplete information to be corrected. Depending on the circumstances, you can also ask for erasure, restriction of processing or data portability, or object to certain uses of your information. You can object to direct marketing at any time. If we rely on consent, you can withdraw it at any time. This does not affect the lawfulness of what we did before withdrawal.

You can make a subject access request verbally or in writing to any member of staff. You are welcome to use the privacy contact at the start of this notice. Where reasonably necessary, we may ask for information to verify your identity or understand what you are requesting.

A subject access response can include confirmation that we use your information, a copy of the information and details about how we use it. This can include the purposes, categories of information, recipients, retention periods or criteria, the source of information we obtained elsewhere, and relevant information about automated decision-making where applicable.

Data protection complaints

If you are concerned about how we handle your personal information, you can complain to the school by contacting our School Business and Development Manager – Duncan Paton – dpaton@spsp.org.uk. We will acknowledge the complaint within 30 days, take appropriate steps to investigate it and tell you the outcome without undue delay.

You also have the right to complain to the Information Commissioner's Office (ICO). Visit https://ico.org.uk/make-a-complaint/ for details.

Our website

Personal information collected online

We use the information you provide through our website to respond to enquiries, process registrations and provide the information or services you request. If you sign up for email updates or newsletters, we use your contact details to send them to you.

Our website may also collect technical and usage information, such as your IP address, approximate location, browser type, how you reached the site, which pages you visit and how long you spend on the site. We use this information to operate the website and understand how visitors use it.

Cookies and analytics

Cookies are small pieces of information that a website can store on a device. We use cookies and similar technologies to operate the site and, where applicable, to understand how visitors use it.

Our website uses cookies and similar technologies. The **Our Website** section of our website privacy policy explains how the website collects information and describes its use of cookies and Google Analytics.

Third party websites

Our website may link to other sites. Their privacy notices explain how they handle your information.

CCTV

CCTV captures images of people in the areas covered by the School's cameras. In some cases, we can identify a person using the footage alongside other information.

We use CCTV to safeguard pupils, staff and visitors, keep the site secure, prevent and detect crime, and investigate incidents. Relevant footage may also be used as evidence for a formal follow-up to an incident. Our lawful basis is our legitimate interest in protecting people and property and responding to incidents.

Who can access footage

Access to footage is restricted to authorised people who need it for their role or to deal with a specific incident. The school roles authorised to access footage are:

Headteacher – Tom Newton

Senior Teacher – Alison Austin

School Business and Development Manager – Duncan Paton

Estates Manager – Ian Marsh

When we share footage

We may disclose relevant footage to the police, safeguarding authorities or other recipients where there is a lawful reason to share it. For example, we may share footage to help investigate a crime or locate a pupil whose safety is at risk.

How long we keep footage

We normally retain CCTV footage for up to 30 days using the standard recorder process. If footage is needed for an investigation, safeguarding matter, complaint or legal claim, we keep the relevant

footage securely for as long as needed for that purpose. To ask about CCTV or exercise your data protection rights, use the privacy contact at the start of this notice.