



Saint Jérôme
Church of England
Bilingual School

Privacy Notice for
Pupils, Parents and Carers

Notice created:	September 2022
Notice reviewed and updated:	September 2026
Date of next review:	September 2027
Linked policies:	Data Protection Policy, Freedom of Information Policy, Online Safety Policy.

Version history

Date	Version	Summary of changes
September 2022	V1	Original notice.
September 2026	V2	Corrected two typos present throughout the original: the office email address was written as 'stjeromebilingual.orbg', and the DPO's name was written as 'Clarie Mehegan' rather than Claire Mehegan. Fixed a dropped word: 'we reserve the to verify' should read 'we reserve the right to verify'. Updated the Data Protection Rights section to reflect the Data (Use and Access) Act 2025, which introduced the 'reasonable and proportionate search' standard for subject access requests. Updated the Complaints section to note that the Information Commissioner's Office (ICO) becomes the Information Commission from 30 September 2026, while keeping the same contact details, since its functions transfer across unchanged. Put into house format. Corrected the named School Data Protection Lead contact throughout: Natasha McCarthy has left the school, and the current Office Manager is Anne Quigg.

Under data protection law, you have a right to be informed about how the school uses any personal data we hold about you. We comply with this by providing this privacy notice, sometimes called a 'fair processing notice'.

This notice explains how we collect, store and use pupil and parent/carer personal data. In this notice, 'you' and 'your' includes both the pupil and the pupil's parents or carers, individually and collectively, unless otherwise specified.

Saint Jérôme Church of England Bilingual School is the 'data controller' for the purposes of data protection law. We have appointed Grow Education Partners Ltd, LDBS's GROW service, as our Data Protection Officer (DPO); the responsible contact is Claire Mehegan (see Contact Us below).

The Personal Data We Collect and Hold

Personal data we may collect, use, store and share about pupils and parents/carers includes, but is not limited to:

- Personal information, such as name, date of birth, unique pupil number, and a parent's or carer's national insurance number
- Contact details and preferences for you and your emergency contacts
- Assessment information, such as data scores, tracking, and internal or external testing
- Protected characteristics, such as ethnic background, religion or belief
- Special educational needs information, such as EHC plans, applications for support, or care and support plans
- Exclusion information
- Relevant medical information, such as NHS information, health checks, physical and mental health care, immunisation status, allergies and medical conditions
- Attendance information, such as sessions attended and reasons for absence
- Safeguarding information
- Details of any support received, including care packages, plans and providers
- Photographs, for internal safeguarding and security purposes, school newsletters, media and promotional purposes
- CCTV images captured on site
- Data about your use of the school's information and communications systems
- Payment and banking details, where required.

We may also hold data received from other organisations, including previous schools, local authorities and the Department for Education (DfE). A full breakdown of the information we hold can be requested by contacting Anne Quigg, Office Manager, via office@stjeromebilingual.org.

Why We Collect and Use This Information

- Contacting you about your child, or informing you about school events and updates
- Supporting pupil learning
- Monitoring and reporting on pupil progress
- Providing appropriate pastoral care
- Protecting pupil welfare and safeguarding
- Assessing the quality of our services
- Administering admissions waiting lists
- Carrying out research
- Complying with the law regarding data sharing
- Adhering to the statutory duties placed on us by the DfE.

The Lawful Basis on Which We Use This Information

For personal data generally, we rely on one or more of the following: you have given consent; processing is necessary to comply with our legal obligations; processing is necessary to protect your vital interests; processing is necessary for tasks in the public interest or the exercise of official authority (the provision of education); or processing is necessary for our legitimate interests or those of a third party.

For special category data, which is more sensitive, we rely on: your explicit consent; necessity to fulfil the school's obligations or your own; necessity to protect your vital interests; processing carried out by a not-for-profit body, including religious organisations; or reasons of public interest in public health.

For example, the submission of school census returns, including named pupil records, is a statutory requirement under section 537A of the Education Act 1996. This statutory basis means the school does not need parental or pupil consent to provide this information, and protects the school from any suggestion that it is breaching a duty of confidence to pupils.

Where we have obtained consent to use pupils' personal data, this can be withdrawn at any time; we will explain how when we ask for consent.

Collecting Pupil Information

While most information we collect is mandatory, some can be provided voluntarily. We make clear whether providing information is mandatory or optional, and if mandatory, explain the possible consequences of not complying.

Storing Pupil Data

We keep your information for as long as we need to educate and look after our pupils. Most of this is stored in the pupil file, which follows the pupil when they move schools and is retained by their last school. Where legally required, we keep some information after a pupil has left, in line with our Data Retention Schedule, available on request from Anne Quigg, Office Manager.

We have data protection policies and procedures in place, including organisational and technical measures, regularly reviewed. See also our Data Protection Policy.

Data Sharing

To function legally, effectively and efficiently, we share data with appropriate third parties, including but not limited to: our local authority, for safeguarding concerns and exclusions; the DfE; the pupil's family and representatives, such as in an emergency; examining bodies; Ofsted, during an inspection; suppliers and service providers contracted to provide a service; central and local government; our auditors; health authorities (NHS); security organisations; health and social welfare organisations; professional advisers; charities and voluntary organisations; police forces, courts, tribunals and security services; professional bodies; and schools pupils attend after leaving us.

International Data Transfers

We may send your information to other countries where we, or a company we work with, store information on computer servers based overseas, or where we communicate with you while you are overseas.

We carry out due diligence on the companies we share data with, and note whether they process data in the UK, the EEA (the European Union, Liechtenstein, Norway and Iceland), or outside the EEA. The UK and EEA countries are required to adhere to equivalent data protection standards. For organisations processing data outside the UK and EEA, we assess the circumstances and ensure there is no undue risk, and that adequate legal provisions are in place to transfer data outside the UK.

Why We Share Information

We share pupils' data with the DfE on a statutory basis, underpinning school funding and educational attainment monitoring. We are required to share information about our pupils with our local authority and the DfE under section 3 and, as an academy, regulation 5, of the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the data collection requirements placed on us by the DfE, for example via the school census, visit gov.uk/education/data-collection-and-censuses-for-schools.

The National Pupil Database

The National Pupil Database (NPD) is owned and managed by the DfE and holds information about pupils in schools in England, informing independent research and departmental studies. We are required by law to provide pupil information as part of statutory data collections, some of which is stored in the NPD, under the Education (Information About Individual Pupils) (England) Regulations 2013.

The department may share NPD information with third parties who promote children's education or wellbeing in England, subject to a strict approval process assessing who is requesting the data, its purpose, its sensitivity, and the security arrangements in place. Find out more at find-npd-data.education.gov.uk, or about the department's wider data sharing process at gov.uk/data-protection-how-we-collect-and-share-research-data.

Data Protection Rights

You have a right to make a 'subject access request' to gain access to personal information the school holds about you. If you make a request, and we hold information about you, we will give you a description of it, tell you why we are holding and processing it and how long we will keep it for, explain where we got it from if not from you, tell you who it has been or will be shared with, and let you know whether any automated decision-making is being applied to it. We will not provide information where it would compromise the privacy of others, and will give you a copy of the information in an intelligible form.

Under the Data (Use and Access) Act 2025, which amended the UK GDPR, you are entitled to the personal data we are able to provide based on a reasonable and proportionate search; we are not required to conduct an exhaustive search of every system if doing so would be disproportionate to the request. If we need more information from you to carry out a reasonable search, the one-month response clock pauses until we receive it.

In most cases, we will respond to subject access requests within one month, as required under data protection legislation. We are able to extend this period by up to two months for complex requests or exceptional circumstances.

Your other rights regarding your data include the ability to:

- Withdraw your consent to processing at any time, where the school relies on consent as its lawful basis
- Ask us to rectify, erase or restrict processing of your personal data, or object to it in certain circumstances
- Prevent the use of your personal data for direct marketing
- Challenge processing justified on the basis of public interest, official authority or legitimate interests
- Request a copy of agreements under which your personal data is transferred outside the United Kingdom
- Object to decisions based solely on automated decision-making or profiling
- Request that we cease processing likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Submit a complaint to us, and if you remain dissatisfied, to the regulator
- Ask for your personal data to be transferred to a third party in a structured, commonly used, machine-readable format, in certain circumstances.

If you would like to exercise any of these rights, please contact Anne Quigg, Office Manager: Email: office@stjeromebilingual.org. Phone: 020 3019 6363. Post: Saint Jérôme Church of England Bilingual School, 120–138 Station Road, Harrow HA1 2DJ.

We will comply with data protection legislation in dealing with all requests submitted in any format, though individuals are asked to preferably submit requests in writing to assist with comprehension. We reserve the right to verify the requester's identity by asking for photo ID; if this proves insufficient, further identification may be required.

Parents/carers can make a subject access request on behalf of their child where the child is not considered mature enough to understand their own rights over their data, usually under the age of 12, or where the child has provided consent. Parents/carers also have a legal right to access their child's educational record.

Data Protection Breaches

If you suspect that your or someone else's data has been subject to unauthorised or unlawful processing, accidental loss, destruction or damage, please contact Anne Quigg, Office Manager without undue delay.

Complaints

We take any complaints about our collection and use of personal information very seriously. If you think our collection or use of personal information is unfair, misleading or inappropriate, or you have any other concern, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer, Claire Mehegan, LDBS's GROW Data Protection Officer, at claire.mehegan@london.anglican.org, or 0207 932 1100, LDBS, 36 Causton Street, London SW1P 4AU.

Alternatively, if you remain dissatisfied, you can refer a complaint to the regulator, currently known as the Information Commissioner's Office (ICO), becoming the Information Commission from 30 September 2026:

- Report a concern online at ico.org.uk/concerns
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Contact Us

If you have any questions, concerns or would like more information about anything in this privacy notice, please contact either our School Data Protection Lead, Anne Quigg, Office Manager, or our Data Protection Officer, Claire Mehegan, LDBS's GROW Data Protection Officer, at claire.mehegan@london.anglican.org, or 0207 932 1100.