



## Privacy & Data Protection (All Hallows Catholic School) September 2025

### Mother Teresa Catholic Academy Trust

<b>Date approved by Governors</b>	<b>23 September 2025</b>
<b>Review Date</b>	<b>September 2026</b>
<b>Body Responsible for Review</b>	<b>Full Board / LGB</b>

<b>Document Control</b>	
V1.0	1 September 2025

## MTCAT VISION & VALUES

### VISION

**"STRENGTH IN UNITY"** - The power of a couple or team pulling together, working for the same goal, striving to reach a common destination, is far greater than the sum of its parts.

**OUR VISION** is to create a nurturing and enriching educational community where the light of Christ shines brightly, guiding the journey of our children aged 2-19. In unity, we will provide an exceptional Catholic education that empowers children to achieve their highest potential, guided by the light and truth of Christ. Together, we build a future filled with hope, love, and the promise of a brighter tomorrow.

### STATEMENT

All Hallows Catholic School is committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller and the handling of such data in line with the data protection principles and the Data Protection Act (DPA).

<https://ico.org.uk/for-organisations/guide-to-data-protection/data-protection-principles/>

Changes to data protection legislation shall be monitored and implemented in order to remain compliant with all requirements.

The company responsible for data protection at All Hallows Catholic School is: **SchoolPro TLC**

The school is also committed to ensuring that its staff are aware of data protection policies, legal requirements and adequate training is provided to them annually.

The requirements of this policy are mandatory for all staff employed by the school and any third party contracted to provide services within the school/trust.

#### **Notification:**

Our data processing activities will be registered with the Information Commissioner's Office (ICO) as required of a recognised Data Controller. Details are available from the ICO:

<https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

Changes to the type of data processing activities being undertaken shall be notified to the ICO and details amended in the register.

Breaches of personal or sensitive data shall be notified immediately to the individual(s) concerned and the ICO.

#### **Personal and Sensitive Data:**

All data within the school's control shall be identified as personal, sensitive or both to ensure that it is handled in compliance with legal requirements and access to it does not breach the rights of the individuals to whom it relates.

The definitions of personal and sensitive data shall be as those published by the ICO for guidance:

<https://ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/>

The principles of the Data Protection Act shall be applied to all data processed:

1. Processed fairly and lawfully
2. Obtained only for lawful purposes, and is not further used in any manner incompatible with those original purposes
3. Accurate and, where necessary, kept up to date,
4. Adequate, relevant and not excessive in relation to the purposes for which it is processed
5. Not kept for longer than is necessary for those purposes
6. Processed in accordance with the rights of data subjects under the DPA
7. Protected by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage
8. Not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection of the personal information

### **Fair Processing**

We shall be transparent about the intended processing of data and communicate these intentions via notification to staff, parents and pupils prior to the processing of individual's data.

Notifications shall be in accordance with ICO guidance and, where relevant, be written in a form understandable by those defined as 'Children' under the legislation.

<https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-notices-transparency-and-control/>

The intention to share data relating to individuals to an organisation outside of our school/trust shall be clearly defined within notifications and details of the basis for sharing given. Data will be shared with external parties in circumstances where it is a legal requirement to provide such information.

Any proposed change to the processing of individual's data shall first be notified to them.

Fair Processing and a privacy notice are reviewed annually and shared on our website: [www.allhallows.net](http://www.allhallows.net)

### **Data Security:**

In order to assure the protection of all data being processed and inform decisions on processing activities, we shall undertake an assessment of the associated risks of proposed processing and equally the impact on an individual's privacy in holding data related to them.

Risk and impact assessments shall be conducted in accordance with guidance given by the ICO:

<https://ico.org.uk/for-organisations/guide-to-data-protection/principle-7-security/>

<https://ico.org.uk/for-organisations/guide-to-data-protection/principle-7-security/>

<https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2014/02/privacy-impact-assessments-code-published/>

Security of data shall be achieved through the implementation of proportionate physical and technical measures. Nominated staff shall be responsible for the effectiveness of the controls implemented and reporting of their performance.

The security arrangements of any organisation with which data is shared shall also be considered and these organisations shall provide evidence of the competence in the security of shared data.

### **Data Access Requests (Subject Access Requests):**

All individuals whose data is held by us, has a legal right to request access to such data or information about what is held. We shall aim to respond to such requests within 40 school days and they should

be made in writing to: [DPO@allhallows.net](mailto:DPO@allhallows.net)

The schools/Trusts data company is:

**Schools Pro TLC**

**Unit 1b Aerotech Business Park, Bamfurlong Lane, Cheltenham, United Kingdom, GL51 6TU**

**Tel: [01452 947633](tel:01452947633)**

**e-mail: [DPO@schoolpro.uk](mailto:DPO@schoolpro.uk)**

A charge may be applied to process the request.

[https://ico.org.uk/media/for-organisations/documents/1586/personal\\_information\\_online\\_small\\_business\\_checklist.pdf](https://ico.org.uk/media/for-organisations/documents/1586/personal_information_online_small_business_checklist.pdf)  
<https://ico.org.uk/media/for-organisations/documents/1235/definition-document-schools-in-england.pdf>

**Photographs and Video:**

Images of staff and pupils may be captured at appropriate times and as part of educational activities for use in school only including the school's website.

Unless prior non-consent from parents/pupils/staff has been given, the school shall not utilise such images for publication or communication to external sources.

It is the school's policy that external parties (including parents) may capture images of staff or pupils during activities unless prior consent has been denied.

In common with all other schools, it is our practice to use photographs of our students in school publications and publicity materials, including the school prospectus, newsletter and website. We also provide news stories and accompanying photographs to our local newspapers and the Catholic Diocesan magazines.

We find that our students are usually very happy to see themselves in such publications. Although very rare, we recognise that some parents may not wish to allow their children to be included in any such photographs. Obviously, this does cause difficulties e.g. a student may have to be excluded from a football team photo. We hope that parents will continue to feel confident that the school uses photographs of its students in totally appropriate ways and will see the pleasure most students obtain from seeing themselves 'in print' or on the school website against any possible concerns. Images may be used for up to 2 years after the student leaves All Hallows Catholic School.

In general, children are not separately named when small group pictures are used. (Clearly it is impossible to guarantee that a particular child will not be discernible in the background of a general photograph.)

If you do not wish your child to be photographed, please opt **out** on the **Student Information Online Response Form**.

**Data Disposal:**

The school recognises that the secure disposal of redundant data is an integral element to compliance with legal requirements and an area of increased risk.

All data held in any form of media (paper, tape, electronic) shall only be passed to a disposal partner with demonstrable competence in providing secure disposal services.

All data shall be destroyed or eradicated to agreed levels meeting recognised national standards, with confirmation at completion of the disposal process.

Disposal of IT assets holding data shall be in compliance with ICO guidance:

[https://ico.org.uk/media/for-organisations/documents/1570/it\\_asset\\_disposal\\_for\\_organisations.pdf](https://ico.org.uk/media/for-organisations/documents/1570/it_asset_disposal_for_organisations.pdf)

The school has identified a qualified source for disposal of IT assets and collections. The company the school uses is:

**WEEE Collection**

SP Commissioning

Unit 7a Ladycross Business Park

Hollow Lane

Dormansland

Surrey RH7 6PB

[WEEE Collection Website](#)

**BACKGROUND INFORMATION**

This document is a statement of the Data Protection Policy for Mother Teresa Catholic Academy Trust. It was developed by the Trust Directors in consultation with Headteachers, Governors and Directors within the Trust.

Signed:	Date:	Review Date:
Ian Anderson <b>Chair of Governors</b>	<b>23 September 2025</b>	<b>September 2026</b>