Privacy Notice for Pupils, Parents/Carers

Who we are.

We are Holy Trinity CofE Primary School, Trinity Road South, West Bromwich, West Midlands B70 6NF. We are a maintained school for children aged 3 to 11. This privacy notice was written on 8th September 2026 and explains how we collect, store and use personal data about our pupils. We Holy Trinity CofE Primary School are the 'data controller' for the purposes of the General Data Protection Regulation (GDPR) and are obliged to inform you of the information we hold on you and your child(ren), what we use it for, who we share it with, and for how long we keep it.

Pupil

Personal Information:

- Name
- Address
- Date of Birth
- Unique pupil number

Characteristics:

- Gender
- Ethnicity
- Religion
- Nationality
- Preferred Language
- Country of birth
- Free School Meal eligibility
- Special educational needs information - EHCP's, statements, applications for support, care or support plans
- Medical Conditions and relevant medical information - NHS information, health checks, physical and mental health care, immunisation program and allergies)
- Attendance information. Session attended, number of absences and absence reasons and exclusion information.
- Assessment information - data scores, tracking, and internal and external testing
- Behavioural information – details of support, including care packages, plans and support.
- Safeguarding information

- Photographs - for internal safeguarding & security purposes, school newsletters, media and promotional purposes
- CCTV images

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education

Parent/Carer

- Name
- Address
- Telephone number.
- Email address.
- Date of Birth
- Identification documents
- Emergency contact preference telephone number
- National insurance number
- Income/benefit details

Why We Collect and Use This Information

The personal data we process is provided to us directly by you.

We use the pupil and parent data to:

- support pupil learning.
- to monitor and report on pupil progress.
- to provide appropriate pastoral and medical care
- for safeguarding and pupil welfare purposes
- administer admissions waiting lists.
- for research purposes
- to inform you about school events
- to assess the quality of our services
- to comply with the law regarding data sharing

The lawful basis on which we use this information.

All personal data must be processed using at least one lawful basis, such as:

- Consent (permission has been given)
- Contract (necessary for a new/existing contract)
- Legal obligation (to comply with the law)
- Vital interests (to protect someone's life)
- Public task (for official functions/tasks in the public interest)
- Recognised legitimate interest (safeguarding, emergencies, preventing crime, etc)

Our lawful basis for collecting and processing pupil information is further defined under Article 9, in that some of the information we process is deemed to be sensitive, or special category data. The following elements of the article apply:

a) The data subject (Pupil, parent or carer) has given explicit consent.
b) It is necessary to fulfil the obligations of controller (school) or of data subject. (pupil, parent/carer)
c) It is necessary to protect the vital interests of the data subject. (pupil, parent/carer)
d) Processing is carried out by a foundation or not-for-profit organisation (includes religious, political or philosophical organisations and trade unions)
e) Reasons of public interest in the area of public health
f) It is in the public interest.

Collecting Pupil Information

We collect your personal information directly from you via the school data collection process. We also receive your data via the Local Authority or from a transferring school (if applicable)

A full breakdown of the information we collect on pupils can be found in the school's data mapping document.

Who We Share Pupil Information With

We routinely share pupil information with appropriate external agencies to meet our legal obligation or where we have sought your permission. The agencies who we routinely share pupil information with include:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions.
- The Department for Education (DfE)
- Educators and examining bodies.
- Ofsted
- Suppliers and service providers – to enable them to provide a service as part of a contract – Music lesson providers SIPS ; school meal providers AIP Alliance in Partnership; school photographers - Wrates. Book Club, Rockstars and Sports Coaches.
- Financial organisations – Total Finance
- Central and local government - Sandwell Metropolitan Borough Council
- Our auditors
- Survey and research organisations.
- Health authorities - Sandwell MBC
- Public Health England
- Security organisations - Site Watch
- Health and social welfare organisations
- Professional advisers and consultants – Lichfield Diocese - SMBC
- Charities and voluntary organisations - Black Country Women's Aid
- Police forces, courts, tribunals
- Professional bodies
- Schools that the pupil's attend after leaving us.

If we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Please contact our Data Protection Lead (see contact details at the end of this privacy notice) who can provide you with further details of who we share pupil information with as recorded in our data mapping document.

How we Use the Information you Provide to us and Why we Share Pupil Information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds, which justify our use of this data. Such reasons include:

The submission of the school census returns to the Department of Education (DfE). The DfE collects personal data from educational settings and the local authorities via various statutory data collections. We are required to share information about our pupils with the DfE either directly or via our local authority for the purpose of those data collection as follows:

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring. We are required to share information about our pupils with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information about Individual Pupils) (England) Regulations 2013.

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All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current government security policy framework.

For more information, please see 'How Government uses your data' section.

Data Collection Requirements

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to https://www.gov.uk/education/data-collectionand-censuses-for-schools.

For more information about the department's data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

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For information about which organisations the department has provided pupil information, (and for which project), please visit the following website: https://www.gov.uk/government/publications/national-pupil-database-requests-received

To contact DfE: https://www.gov.uk/contact-dfe

Storing pupil data

We hold pupil data whilst pupils attend our School/academy. The file will follow the pupil when they leave the school. However, we have a legal obligation to keep information beyond their attendance at the school, which will be destroyed in line with our data retention schedule as outlined within out data mapping document. Please contact us if you would like further clarification on our retention timescales.

We have data protection policies and procedures in place, including strong organisational and technical measures, which are regularly reviewed. Further information can be found in our Data Protection Policy on our website.

Failure to provide data.

Failure to provide the requested data may result in consequences such as:

- Lack of compliance with legal obligations and statutory data collections resulting in delays with school placements.
- Inability to safeguard appropriately.
- Inability to ensure appropriate access arrangements can be provided.
- Delays or errors in monitoring attainment and supporting progress.
- Delays or errors in applying applicable eligibility support (e.g., Free School meals).

Requesting Access to your Personal Data and your Data Protection Rights

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold, through a Subject Access Request. Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent. Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

We will provide information in a way that is:

- Concise
- Transparent
- Intelligible
- Easily accessible
- Uses clear and plain language.

If you would like to make a subject access request, please contact our Data Protection Lead. School Business Manager.

Data subjects have the following rights with regards to their personal information, as follows:

- Confirmation that their personal data is being processed.
- Access to a copy of the data
- The purpose of the data processing
- The categories of personal data concerned.
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period.

- Where relevant, the existence of the right to request rectification, erasure or restrictions, or to object to such processing.
- The right to lodge a complaint with the ICO or another supervisory authority.
- The source of the data, if not the individual
- The safeguards provided if the data is being transferred internationally.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress.
- prevent processing for the purpose of direct marketing.
- object to decisions being taken by automated means.
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;
- claim compensation for damages caused by a breach of the Data Protection regulations 11.

Contact Us

In the first instance, any questions, concerns or complaints relating to data protection should be directed to the Data Protection Lead (DPL) at School – Business Manager. This includes requests to exercise data protection rights, such as making a Subject Access Request, reporting a suspected personal data breach, or raising general queries regarding the school's/academy's processing of personal data.

If you are dissatisfied with the school's response to your concern, query or complaint, please refer to the Data Protection Complaints Policy available on the school's website, which explains the process for raising and escalating data protection complaints.

If, having completed the school's complaints process, you remain dissatisfied with the outcome, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) at:

Information Commissioners Office, Wycliffe House Water Lane Wilmslow Cheshire, SK9 5AF

Tel: 0303 123 1113

Website: https://ico.org.uk

Changes to this privacy notice

This privacy notice may be updated from time to time. We encourage you to check this privacy notice from time to time to ensure you understand how your data will be used and to see any minor updates. If material changes are made to the privacy notice, for example, how we would like to use your personal data, we will provide a more prominent notice (for example, email notification or correspondence of privacy notice changes).