

## Privacy Notice (How we use pupil information)

### **Holy Trinity Church of England Primary School**

This privacy notice explains how we collect, use, store and share personal information about pupils at our school. It applies to all pupils and, where relevant, their parents and carers.

Holy Trinity Church of England Primary School is a voluntary controlled, locally maintained Church of England school. Staffordshire County Council is the local authority.

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### The categories of pupil information that we process include:

We may collect, store and use the following categories of pupil information:

- personal identifiers and contact details, for example name, date of birth, unique pupil number (UPN), address, parental contact details
- characteristics, for example ethnicity, language, nationality, country of birth and eligibility for free school meals or pupil premium
- safeguarding information, for example court orders, professional involvement, child protection and looked after status
- special educational needs and disabilities (SEND), including needs, provision and ranking
- medical and health information, for example GP details, allergies, medication, dietary requirements and care plans
- attendance information, for example sessions attended, absences, reasons for absence and previous schools attended
- assessment and attainment information, for example teacher assessments, statutory assessments, phonics results and end of key stage outcomes
- behaviour information, for example behaviour incidents, exclusions and alternative provision arrangements
- pastoral and wellbeing information, including support records and interventions
- information relating to trips, activities and clubs
- catering information, including free school meal management
- photographs and video images used for educational, safeguarding and promotional purposes, where appropriate

This list is not exhaustive. The most up to date version of this privacy notice and our data asset register are available on the school website.

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### Why we collect and use pupil information

We collect and use pupil information for the following purposes:

- to support pupil learning and educational progress
  - to monitor, assess and report on attainment and progress
  - to provide appropriate pastoral care, safeguarding and welfare support
  - to support pupils with special educational needs and disabilities
  - to manage behaviour, attendance and inclusion
  - to keep pupils safe, including medical needs, allergies and emergency contacts
  - to assess and improve the quality of our educational provision
  - to communicate effectively with parents and carers
  - to meet our statutory duties and legal obligations, including Department for Education data collections
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## Lawful basis for processing pupil information

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing pupil information are:

- **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 for us to perform a task in the public interest or in the exercise of official authority as a school

Where we process special category data, including health, safeguarding, SEND or ethnicity information, we rely on:

- **Article 9(2)(g)** – substantial public interest, supported by UK law
- **Article 9(2)(h)** – health or social care purposes
- **Article 9(2)(i)** – public interest in public health, where applicable

The key legislation that supports this processing includes, but is not limited to:

- The Education Act 1996
- The Education Act 2002
- The Children Act 1989 and 2004
- The Education (Information About Individual Pupils) (England) Regulations 2013
- Keeping Children Safe in Education

Where consent is used, for example for optional photographs or certain activities, this will be clearly explained at the point of collection and may be withdrawn at any time.

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## Collecting pupil information

We collect pupil information in a number of ways, including:

- registration and admission forms completed by parents and carers
- information provided directly by parents, carers and pupils

- common transfer files (CTFs) from previous schools
- secure electronic systems used by the school and local authority
- correspondence with professionals such as health, education and social care services

Most of the pupil information we collect is required by law or is necessary for us to fulfil our duties as a school. Some information is provided on a voluntary basis. We will always make this clear at the point of collection.

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## Storing pupil data

We hold pupil information securely in line with data protection legislation and follow Staffordshire County Council and Department for Education guidance on data retention.

Pupil data is stored securely using a combination of physical security measures and secure electronic systems with restricted access. We only retain information for as long as it is necessary and in accordance with our data retention schedule.

Further information about how we store data, how long we keep it and how we keep it safe can be found in our Data Protection Policy and Retention Schedule on the school website.

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## Who we share pupil information with

We routinely share pupil information with:

- schools that pupils attend after leaving us
  - Staffordshire County Council, as our local authority
  - the Department for Education (DfE)
  - health services, including the school nursing service and NHS professionals
  - social care services where safeguarding or welfare concerns exist
  - educational professionals and support services, including SEND services
  - examination and assessment bodies where relevant
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## Why we share pupil information

We do not share information about pupils with anyone without a lawful basis. Information is shared where necessary to:

- support pupils' education, welfare and safeguarding
- fulfil our legal and statutory duties
- enable effective transition between schools
- support health, social care and educational services

All data is shared securely and only with organisations that have appropriate data protection safeguards in place.

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## Department for Education (DfE)

The Department for Education (DfE) collects personal data from schools and local authorities through statutory data collections, including the school census.

For maintained schools, this information is shared under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

The DfE uses this data to:

- calculate school funding
- monitor educational performance and outcomes
- support research and the development of education policy

All data is transferred securely and handled in accordance with government security standards.

Further information about how the DfE uses pupil data is available via the DfE privacy notices.

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## Your rights

Under UK GDPR, parents and pupils have rights including:

- the right to be informed about how personal data is used
- the right of access to personal data (subject access requests)
- the right to rectification of inaccurate or incomplete data
- the right to erasure, in certain circumstances
- the right to restrict processing, in certain circumstances
- the right to object to processing, in certain circumstances
- rights in relation to automated decision making and profiling
- the right to withdraw consent, where consent is the lawful basis

Some rights may not apply where the lawful basis for processing is a legal obligation or public task.

If you have concerns about how we use personal data, you should contact the school in the first instance. You also have the right to complain to the Information Commissioner's Office (ICO).

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## Contact details

If you would like to discuss this privacy notice or request access to personal data, please contact:

**Data Protection Officer**

Staffordshire County Council

Email: [information.governance@staffordshire.gov.uk](mailto:information.governance@staffordshire.gov.uk)

Or contact the school directly via the school office.

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## Review of this notice

We review this privacy notice regularly and update it as required.

**Last updated:** January 2026