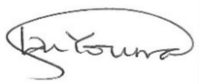
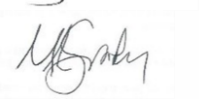
The Sycamore Church of England Trust

Grow together, Learn forever

Privacy Notice: Parents and Carers

Applicable to:	All Trust Schools
Adopted By:	Trust Board
Date Adopted:	May 2018
Authorised Signatory:	
Mr Ian Young – Trust Leader and CEO	
Mr Mark Granby – Chair of Board of Trustees	
Review Period:	Annually
Last Update:	January 2026
Next Review:	January 2027

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Record of Policy Changes and/or Reviews

Date	Details	Reason for Review/Change
January 2026	Sentence added to complaints section: We will acknowledge your concern within 30 days and will respond without undue delay.	ICO advice following review

Introduction

Under data protection law, individuals have a right to be informed about how the Trust uses any personal data that we hold about them. We comply with this right by providing privacy notices (sometimes called fair processing notices) to individuals where we are processing their personal data.
This privacy notice explains how and why we collect, store and use personal data about pupils.

We, The Sycamore CE Trust are the 'data controller' for the purposes of data protection law. The Trust is registered as a data controller with the Information Commissioners Office (ICO). Our registration number is ZA253323

This Privacy Notice relates to The Sycamore CE Trust, and its constituent Academies:

- Christ Church CofE Primary School
- St. John's CofE Primary School
- Radcliffe Hall CofE / Methodist Primary School
- St Stephen's CofE Primary School
- St Thomas's C.E Primary School
- Holy Trinity C.E Primary School

and any other Academy which joins the Trust in the future (hereafter referred to as the 'Trust').

Our data protection officer is Shard Business Services (see **'Contact us'** below).

Definition of Parent

The term 'parent' is widely defined in education law to include the natural or adoptive parents (regardless of whether parents are or were married, whether a father is named on a birth certificate or has parental responsibility for the pupil, with whom the pupil lives or whether the pupil has contact with that parent) and includes non-parents who have parental responsibility for the pupil, or with whom the pupil lives.

It is, therefore, possible for a pupil to have several "parents" under education law. This Privacy Notice also covers other members of pupils' families who we may process data about from time to time, including, for example, siblings, aunts and uncles and grandparents.

1. Data Protection Principles

Personal Data must be processed in accordance with the six Data Protection Principles. It must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept for as long as necessary for the purposes we have told you about.
- Kept securely.

2. Categories of Parent/Carer data we collect.

The categories of parent/carer information that we collect, process, hold, and share includes but are not limited to:

- Personal information (such as name, address, telephone numbers and email address, other named family/friend contact details)
- Information relating to your identity: - e.g., DBS checks for volunteers and parent club providers, free school meal/pupil premium eligibility/entitlement to certain benefits, information about court orders in place affecting parenting arrangements for pupils

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This may include information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability, health and access requirements

3. Collecting Personal Data

We collect parent/carer personal data from:

- Application/admissions forms
- Social Services either in Bury or other Local Authorities if a child is "Looked After", "Previously Looked After" or subject to a Special Guardianship Order.
- The Local Authority or local hospital trust if a child on roll has/has had an assessment because of their Special Educational Needs and/or Disabilities
- Correspondence
- Authorisation for trips and other enrichment activities
- In addition, we also use CCTV cameras in and around some of our sites for security purposes and the protection of staff, governors, volunteers, and other stakeholders.

Whenever we seek to collect information, we will make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying. If you fail to provide certain information when requested, we may be prevented from complying with our official or legal obligations

4. Why we Collect and Process Parent/Carer Information

The Trust collects information to safeguard our users, promote the objects and interests of the Trust, facilitate efficient operations, and ensure that all relevant legal obligations are complied with. For example, we collect data to:

- to decide who to admit
- to maintain a waiting list
- to support pupil learning
- to monitor and report on pupil learning and attainment
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing
- for the protection and welfare of pupils and others, including our safeguarding/child protection obligations
- for the safe and orderly running of the Trust.
- to promote the Trust.
- to send you communications that may be of interest to you which may include information about events or activities, news, campaigns, appeals, other fundraising activities

- to respond to investigations from our regulators or to respond to complaints raised by our stakeholders
- in connection with any legal proceedings threatened or commenced against the Trust.

5. Automated Decision Making

Automated decision-making takes place when an electronic system uses personal information to make decisions without human intervention. We are permitted to use automated decision-making in limited circumstances.

We ***do not*** envisage that any decisions will be taken about you using automated means. However, we will notify you in writing if this position changes.

6. The Lawful Bases on which we Process Personal Data

We only collect and use personal data when the law and our policies allow us to do so. We process general category data where:

- the data subject, or a person with the lawful authority to exercise consent on the data subject's behalf, has given consent
- the processing is necessary for a contract we have with you, or because it is necessary to take steps before entering into a contract with you
- the processing is necessary for us to comply with a legal obligation
- the processing is necessary to protect your vital interest or that of another person.
- the processing is necessary for us to perform a task in the public interest or for our official functions, and this task or function is lawful

We process special category data where:

- the data subject, or a person with the lawful authority to exercise consent on the data subject's behalf, has given explicit consent
- the processing is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent
- the processing relates to personal data which are manifestly made public by the data subject
- the processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
- the processing is necessary for reasons of substantial public interest, based on domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject
- the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Some of the reasons listed above for collecting and using personal data overlap, and there may be several grounds that justify our use of this data.

7. Criminal Proceedings/Convictions or Child Protection/Safeguarding Issues.

This information is not routinely collected and is only likely to be processed by the Trust in specific circumstances relating to a particular pupil. For example, if a child protection issue arises or if a parent/carer is involved in a criminal matter.

Where appropriate, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer (LADO)and/or the Police.

Such information will only be processed to the extent that it is lawful to do so, and appropriate measures will be taken to keep the data secure.

8. Consent

We may process personal information without your consent, in compliance with the above lawful bases, where this is required or permitted by law and our policies.

In limited circumstances, we may require explicit written consent to allow us to process certain particularly sensitive data. If we do so, we will provide full details of the information that we would like and the reason we need it, so that careful consideration may be given to whether you wish to consent.

Where we rely solely on consent as the lawful basis for processing, consent may be withdrawn at any time.

9. Change of Purpose

We will only use your personal information for the purposes for which it was collected unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so, or seek your consent, if necessary, before the processing commences.

10. Storage and Retention of Personal Data

A significant amount of personal data is stored electronically. Some information may also be stored as hard copy.

All data is stored and processed following the data protection legislation.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including to satisfy any legal, accounting, insurance or reporting requirements. Details of retention periods for different aspects of your personal information are available in our ***Data Retention Schedule.***

When your time as a parent/carer at the Trust comes to an end, we will retain and securely destroy your personal information following our Data Retention Schedule.

11. CCTV

CCTV is used at some of our sites. The purpose of the system is to prevent crime and promote security and public safety.

If in the event of viewing CCTV for the specified purpose, a safeguarding or criminal action is observed, the CCTV images can and may be used to support any subsequent investigation.

We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.

Images are retained for a maximum of 30 days. After this period images will be permanently deleted unless they are required and retained for an ongoing investigation. For example, if an incident or crime has been recorded. In such cases, the images will be retained until the conclusion of any actions or criminal proceedings arising from the incident.

Any enquiries about the CCTV system should be directed to office@thesycamoretrust.co.uk

12. Sharing Personal Data

We do not share parent/carer information with anyone without consent unless the law and our policies allow us to do so. We routinely share parent/carer information with:

- schools that pupils attend after leaving us
- the Local Authorities pupils move to where the child is in care or subject to a special guardianship order

From time to time, we may also share parent/carer information with other organisations including:

- a pupils home local authority (if different)
- the Department for Education (DfE)
- Partners and Trustees
- the Police and law enforcement agencies
- NHS health professionals including the school nurse, educational psychologists,
- Education Welfare Officers
- Courts, if ordered to do so
- Prevent teams under the Prevent Duty on Schools
- other schools, for example, if we are negotiating a managed move and we have your consent to share information in these circumstances
- our legal advisors
- our insurance providers/the Risk Protection Arrangement

Other third-party service providers

We also share limited personal data with third-party service providers who require access to data to perform contracted services. These service providers include:

- Messaging service
- Payment service
- Parents Evening Booking Service
-

These third-party service providers act as data processors on the Trust's behalf and are required to take appropriate security measures to protect your personal information in line with our policies and data protection legislation. We authorise these service providers to use personal data only as necessary to perform services on our behalf, or to comply with legal obligations if necessary.

13. Transferring Data Outside The UK

We do not routinely share data with organisations outside the UK. Where this may be necessary, we may transfer data with your explicit consent and with appropriate safeguards.

We will not transfer personal data outside the UK unless such transfer complies with the UK GDPR. This means that we cannot transfer any personal data outside the UK unless:

- The Secretary of State has decided that another country or international organisation ensures an adequate level of protection for personal data
- One of the derogations in the UK GDPR applies (including if an individual explicitly consents to the proposed transfer).

14. Data Security

We have put in place appropriate organisational and technological security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal information to those employees, consultants, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

15. Your Data Subject Rights

You have the right to:

- Make a Subject Access Request (SAR) (see below)
- Withdraw your consent to processing based solely on consent, at any time
- Ask us to rectify, erase or restrict processing of your personal data, or object to the processing of it (in certain circumstances)
- Prevent use of your personal data for direct marketing
- Challenge processing which has been justified based on public interest
- Request a copy of agreements under which your personal data is transferred outside of the United Kingdom
- Object to decisions based solely on automated decision making or profiling. The Trust ***does not use*** automated decision making and/or profiling in any of its processes and procedures
- Prevent processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Make a complaint to the ICO
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

Your Duty to Inform us of Changes

The personal information we hold about you must be accurate and current. Please keep us informed if your personal information changes during your child's time with us.

Subject Access Requests
Under data protection legislation, individuals have the right to request access to their personal data held by the Trust . Subject Access Requests ***may be*** made in writing or verbally.

If you would like to make a SAR concerning your personal data it would be helpful if this could be made in writing to the Trust, including:

- name and contact address
- email address and telephone number
- details of the information required.

Fulfilling A Subject Access Request
The lawful time scales for the Trust to respond to a Subject Access Request is one calendar month from receipt of a '**valid**' SAR.

A SAR is only considered '***valid*** when we are fully satisfied regarding the identity of the requester and their entitlement to the data requested. If in any doubt we will request confirmation of identity to ensure your personal data is not inadvertently released to a third party who is not entitled to it.

The Trust has limited administration resources outside of term time. We encourage parents/carers to submit Subject Access Requests during term time and to avoid sending a SAR just before or during term breaks. This will assist us in responding to your request as promptly as possible.

If the SAR is complex or numerous, the period in which we must respond may be extended by a further two months. You will be notified of any delays in actioning the SAR and provided with a timeframe in which you can expect to receive the requested data.

Fees
You will ***not*** have to pay a fee to access your personal information (or to exercise any of your other data subject rights). However, we may charge a reasonable fee if your access request is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Parental Access to the Education Record
The parental right to view the educational record under the Education (Pupil Information) (England) Regulations 2005 (SI 2005/1437) **does not apply** to Academy Trusts

Parents/carers who wish to access their child's educational record may do so by submitting a Subject Access Request on behalf of their child. Please see the links below for further information.

https://ico.org.uk/your-data-matters/schools/pupils-info/

https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/children-and-the-uk-gdpr/what-rights-do-children-have/

Exercising Other Data Subject Rights
If you wish to review, verify, correct, restrict or request the erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your

personal information to another party, please contact the Trust in the first instance (details below).

The Right to Withdraw Consent
Where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, and there is no other applicable lawful basis for processing the data, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Trust directly.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another lawful basis for doing so.

16 Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concerns about our data processing, please raise this with us in the first instance. We will acknowledge your concern within 30 days and will respond without undue delay.

If you have any concerns that we are not able to resolve to your satisfaction, you can contact our Data Protection Officer at the address below.

Alternatively, you can register your concern with the UK's data protection regulator - the Information Commissioner's Office:

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

17 Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Officer**:

Data Protection Officer:	Shard Business Services
Email:	DPO@Shardbusinessservices.co.uk
Data Controller:	The Sycamore CE Trust
Email:	office@thesycamoretrust.co.uk
Phone:	0161 723 1078 (option 3)
Address:	C/O Christ Church CofE Primary School Church Street, Walshaw, Bury, BL8 3AX

Data Controllers Representative: Ian Young – Trust Lead
Email: office@thesycamoretrust.co.uk

18. Changes to this Privacy Notice

This Notice will be reviewed annually or as necessary in response to changes in Data Protection legislation. We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial updates.

We may also notify you in other ways from time to time about the processing of your personal information.

Effective Date:	May 2018
Last update:	January 2026
Review Date:	January 2027