The Sycamore Church of England Trust

Grow together, Learn forever

Privacy Notice: How We Use Pupil Personal Data

Applicable to:	All Trust Schools
Adopted By:	Trust Board
Date Adopted:	October 2022
Authorised Signatory:	
Mr Ian Young – Trust Leader and CEO	
Mr Mark Granby – Chair of Board of Trustees	
Review Period:	Annually
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 Church of England 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 Church of England Trust, its constituent Academies:

- Christ Church C.E Primary School
- St. John's C.E Primary School
- Radcliffe Hall C.E / Methodist Primary School
- St Stephen's C.E 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 (see 'Contact us' below).

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 only as long as necessary for the purposes we have told you about.
- Kept securely.

2. Types of Data we Collect

Personal data that we collect, use, store and share about pupils may include, but is not restricted to:

- Personal information such as name, date of birth, unique pupil number and address
- Characteristics such as their ethnicity, language, nationality, country of birth, free school meal eligibility and Pupil Premium
- Attendance information such as the number of sessions attended, the number of absences and the reasons for those absences.
- Assessment information such as their current pupil progress, predicted progress and where appropriate data relating to any assessment, test or exams undertaken.

- Relevant medical information including physical and mental health, any conditions, or allergies your child may have, the need for epi-pens/medication, emergency contact details and registered GP details.
- Special educational needs information including the needs and ranking, funding received specifically for your child and any statements of individual needs.
- Details of any support received, including care packages, plans and support providers
- Behavioural information, which may include information about your child's general classroom behaviour including any awards gained, together with any detentions fixed term or permanent exclusions they have received.
- Pastoral and safeguarding information, including notes on any home visits undertaken.
- Safeguarding information (such as court orders, and professional involvement)
- Photographs
- CCTV images (not all sites)
- Any other pupil personal data that we will inform you of from time to time.

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

3. Collecting this Information

We collect pupil personal data from: -

- Application/admissions processes
- Common Transfer files
- Assessment and attainment processes
- Attendance (routine register twice a day)
- Special Educational Needs and Disabilities (SEND) information.
- Parent Communications
- In addition, we also use CCTV cameras in and around some of our sites for security purposes and the protection of staff, pupils, and other stakeholders.

While the majority of information we collect about pupils is mandatory, there is some information that may be provided voluntarily.

Whenever we seek to collect information relating to pupils, we 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 Pupil 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:

- support pupil learning and improve our teaching.
- monitor and report on pupil progress, enabling suitable interventions to be put in place where required.
- provide appropriate pastoral care and to ensure your child has access to appropriate support.
- protect pupil welfare.
- assess the quality of our services.
- keep pupils safe.
- administer admissions lists.
- carry out research.

- comply with the law regarding data sharing.
- carry out our legal obligations as an Academy Trust
- meet statutory duties placed upon us for DfE data collections.

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 made using automated means. However, we will notify you in writing if this position changes.

6. Our Lawful Basis for Using This 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 (typically a parent/carer), has given consent.
- Processing is necessary for a contract we have to provide your child with an education, or because it is necessary to take steps before entering into a contract with you.
- Processing is necessary for us to comply with a legal obligation.
- Processing is necessary to protect the vital interest of your child, or that of another person.
- 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.
- Processing is necessary for our legitimate interests where we are not acting in our official capacity, for example facilitating after-school or extra-curricular activities, or sporting events.

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 (typically a parent/carer), has given explicit consent.
- Processing is necessary to protect the vital interests of your child or those of another person where they are physically or legally incapable of giving consent.
- The processing relates to personal data which are manifestly made public by the data subject.
- Processing is necessary for the establishment, exercise, or defense of legal claims or whenever courts are acting in their judicial capacity.
- 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.
- processing is necessary for reasons of public interest in the area of public health, on the basis of domestic law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy.
- 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 which justify our use of your child's personal data.

7. CCTV

CCTV is in 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

8. Consent

We may process pupil personal data without consent in compliance with the above lawful bases (section 6, above), where this is required or permitted by law and our policies.

We will ask for consent to process personal data where there is no other lawful basis for processing it. For example, if we wish to use your child's photograph on social media or for Marketing Purposes

If we do request your consent, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. Where we rely solely on consent as the lawful basis for processing, that consent may be withdrawn at any time (See below).

9. Change of Purpose

We may only use pupil personal data 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 pupil personal data for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so, or seek your consent, if necessary, before the processing commences.

10. Data Storage and

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

We will only retain pupils personal data 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 personal data are available in our ***Data Retention Policy***.

11. Sharing Personal Data

We do not share pupil data with anyone without consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law) we share personal information about pupils with:

- The Department for Education – to meet our statutory obligations eg to report on pupil progress
- Our Local Authority - to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions and to fulfil our public interest tasks such as the provision of free school meals.
- A pupil's home Local Authority (if different)
- The school that your child attends after leaving us.

Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

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 below.

Local Authorities

We have a statutory duty under Section 14 of the Education and Skills Act 2008 to share certain information about pupils with our local authority to ensure that they can conduct their statutory duties for example under the Schools Admission Code, including conducting Fair Access Panels.

National Pupil Database

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census.

Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.
The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on how it collects and shares research data.
You can also contact the Department for Education with any further questions about the NPD.

NHS and Health Agencies

It may be necessary to share limited personal data including special category data with the NHS and their agents, or other health agencies for the purposes of national immunisation programmes and other health/wellbeing programmes under our public interest tasks as an Academy Trust and to safeguard the vital interests of pupils.

It may be necessary for us to share limited information in the event of a Pandemic. This will enable the agencies to liaise with families to provide advice and support and to take appropriate steps in responding to any outbreaks. In such circumstances, specific supplementary Privacy Notices will be provided.

We may also share pupil data with:

- The pupil's family and representatives – to carry out our public interest tasks such as reporting on pupil progress.
- Our regulator Ofsted which monitors many aspects of our public interest tasks as an Academy Trust
- Central and local government – to meet our legal obligations.
- Our auditors – to meet our legal and public interest obligations relating to financial matters.
- Security organisations – for our public interest tasks in relation to keeping pupils safe, keeping the site secure and preventing crime.
- Health and social welfare organisations – where this is covered by our public interest tasks as an Academy Trust or to safeguard the vital interests of pupils
- Charities and voluntary organisations – which may, for example, provide us with services or support the Trust's educational activities carried out in the public interest.
- Police forces, courts, tribunals – where this is necessary for the prevention and detection of crime, required by law or for purposes arising out of our public interest tasks such as safeguarding pupils.
- Professional bodies – to help us carry out our public interest tasks as an Academy Trust

Suppliers and third-party service providers
We share limited personal data with suppliers and third-party service providers. These service providers include:

- MIS
- Safeguarding system
- Parent Comm
- Educational platform/journal (e.g., Tapestry, See saw, Etc)
- Parent payments
- School photographer
- School Nurse
- Wonde
- Local Authority
- Sports Coaches
- Any other third-party services/service providers that we will inform you of from time to time.

We share limited personal data with these service providers who require access to pupil data to perform contracted services. These third-party service providers act as data processors on the Trust's behalf.

Service providers are contracted to apply the same level of protection for personal data as the Trust and in accordance with the UK GDPR and the Data Protection Act (2018). We authorise service providers to use pupil personal data only as necessary to perform services on our behalf, or to comply with legal obligations if necessary.

12. Transferring Data Outside the UK

We do not routinely share data with organisations outside the UK. Where this may be necessary, e.g. where a former pupil has emigrated outside the UK, data may be transferred to their new school with explicit consent from the parent/carer and with appropriate safeguards.

Under exceptional circumstances, we will only transfer personal data outside the UK if such transfer complies with the UK GDPR. This means that we will not 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).

13. Data Security

We have put in place appropriate security measures to prevent pupil personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to personal data to those employees, consultants, contractors and other third parties who have a business need to know. They will only process pupil 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 and in accordance with our ***Data Security Policy and Breach Procedure***.

14. Your Data Subject Rights

Under data protection legislation individuals have the right to:

- Make a Subject Access Request (SAR) (see below)
- Withdraw consent to processing at any time, where consent is the only lawful basis for that processing.
- Ask us to rectify, erase or restrict processing of your child's personal data, or object to the processing of it (in certain circumstances)
- Prevent use of personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest.
- Request a copy of agreements under which personal data is transferred outside of the European Economic Area
- Object to decisions based solely on automated decision making or profiling. (See section 5 above)
- 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 personal data to be transferred to a third-party in a structured, commonly used, and machine-readable format (in certain circumstances).

For more information regarding individual rights please see here

Your Duty to Inform us of Changes.

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

Subject Access Requests (SAR)

Under data protection legislation, individuals have the right to request access to information about them that we hold. Personal data belongs to the data subject, and in the case of the personal data of a child regardless of their age, the rights in relation to that personal data are theirs and not those of their parents. Parents, in most cases, do not have automatic rights to the personal data of their child.

However, there are circumstances where a parent can request the personal data of their child without requiring the consent of the child. This will depend on the maturity of the child and whether the Trust is confident that the child can understand their rights. Generally, in the UK, where a child is under 12 years of age, they are deemed not to be sufficiently mature as to understand their rights of access and a parent may request access to their personal data on their behalf. The Trust will then determine whether, in their opinion, a pupil is mature enough to understand their rights on a case-by-case basis and act accordingly.

For more information on your child's rights under the UK GDPR please see here

If a parent/carer wishes to make a SAR on the pupil's behalf, it would be helpful, though not mandatory, if this could be made in writing to the Trust including:

- Parent/carer name and contact address (if the SAR is being made on behalf of a pupil)
- Pupil name, address, and class
- Contact 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 pupil personal data is not inadvertently released to a third-party who is not entitled to it.
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 pupil personal information (or to exercise any 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.

Exercising Other Data Subject Rights
If you wish to review, verify, correct, or request the erasure of pupil personal data; object to the processing of personal data, or request that we transfer a copy of your child's personal data 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 child's 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 the data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Withdrawal of consent does not affect the legitimacy of processing prior to consent being withdrawn.

15. 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 concern 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

16. 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 Church of England Trust
Email: office@thesycamoretrust.co.uk
Tel: 0161 723 1078 (option 3)
Address: C/o Christ Church CofE Primary School
Church Street, Walshaw, Bury, BL8

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

17. Changes to this Privacy Notice

This Notice will be reviewed annually or as necessary in relation to changes in Data Protection legislation or our processing activities.

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

How Government uses your data

The pupil data that we lawfully share with the DfE through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

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-collection-and-censuses-for-schools

The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD).

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the department.

It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

To find out more about the NPD, go to https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information

Sharing by the Department

The law allows the Department to share pupils' personal data with certain third parties, including:

- schools
- local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

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

Organisations fighting or identifying crime may use their legal powers to contact DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

For information about which organisations the Department has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website:
https://www.gov.uk/government/publications/dfe-external-data-shares

How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:
https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter

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