



GDPR Privacy Notice

Who processes your information?

Holy Trinity CE Primary School, Sunningdale (hereafter Holy Trinity School or school) is the data controller of the personal information you provide to us. This means the school determines the purposes for which, and the manner in which, any personal data relating to pupils and their families is to be processed.

In some cases, your data will be outsourced to a third party processor; however, this will only be done with your consent, unless the law requires the school to share your data. Where the school outsources data to a third party processor, the same data protection standards that Holy Trinity School upholds are imposed on the processor.

Martin Tubbs works for the local authority, RBWM, and is the data protection officer for the school. His role is to oversee and monitor the school's data protection procedures, and to ensure they are compliant with the GDPR. The data protection officer can be contacted via email at martin.tubbs@rbwm.gov.uk.

Why do we collect and use your information?

Holy Trinity School holds the legal right to collect and use personal data relating to pupils and their families, and we may also receive information regarding them from their previous school, local authority and/or the Department for Education (DfE). We collect and use personal data in order to meet legal requirements and legitimate interests set out in the GDPR and UK law, including those in relation to the following:

- Article 6 and Article 9 of the GDPR
- Education Act 1996
- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013

In accordance with the above, the personal data of pupils and their families is collected and used for the following reasons:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our service
- to comply with the law regarding data sharing
- to safeguard pupils
- to fulfill legal and contractual obligations
- where otherwise reasonably necessary for school purposes.

Which data is collected?

The categories of pupil information that the school collects, holds and shares include the following:

- personal information – e.g. names, pupil numbers and addresses
- characteristics – e.g. ethnicity, language, nationality, country of birth and free school meal eligibility
- attendance information – e.g. number of absences and absence reasons

- assessment information – e.g. national curriculum assessment results
- relevant medical information
- information relating to SEND (Special Educational Needs and Disabilities)
- behavioural information – e.g. number of temporary exclusions
- images of students engaged in school activities and for identification purposes.

Whilst the majority of the personal data you provide to the school is mandatory, some is provided on a voluntary basis. When collecting data, the school will inform you whether you are required to provide this data or if your consent is needed. Where consent is required, the school will provide you with specific and explicit information with regards to the reasons the data is being collected and how the data will be used.

How long is your data stored for?

Personal data relating to pupils at Holy Trinity School and their families is stored in line with the school's GDPR Data Retention Policy.

In accordance with the GDPR, the school does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

Will my information be shared?

The school is required to share pupils' data with the DfE on a statutory basis. This data underpins school funding and educational attainment policy and monitoring.

The National Pupil Database (NPD) is managed by the DfE and contains information about pupils in schools in England. Holy Trinity School is required by law to provide information about our pupils to the DfE as part of statutory data collections, such as the school census; some of this information is then stored in the NPD. The DfE may share information about our pupils from the NDP with third parties who promote the education or wellbeing of children in England by:

- Conducting research or analysis.
- Producing statistics.
- Providing information, advice or guidance.

The DfE has robust processes in place to ensure the confidentiality of any data shared from the NDP is maintained.

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

Holy Trinity School will not share your personal information with any third parties without your consent, unless the law allows us to do so. The school routinely shares pupils' information with:

- schools that the pupils attend after leaving us
- the NHS and School Nurse Team
- the Department for Education

- the LA, who under strict information sharing protocols and policies, may be required to share this information with other public sector partners such as other Local Authorities
- Wilson Jones, school catering partner and their lunch ordering partner, Biostore
- other compliant, third party providers to enhance student learning or education as approved by the Governing Board (e.g. Mathletics, Spellodrome, Purple Mash, Bug Club Library Systems etc)
- Tapestry, a EYFS assessment tool
- other compliant third party providers in order to communicate effectively with families (e.g. Primary Site, Primary Contact etc)
- for Police when part of an investigation. All requests will be referred to the Headteacher or their representative.

For a full list of third party providers please contact the school.

In addition to this, pupil information will be provided to:

- OFSTED to help inspectors to evaluate schools
- Fischer Family Trust (FFT) for subject level analysis compared to previous years

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. We share pupils' data with the Department for Education (DfE) under Section 3 of The Education (Information about Individual pupils) (England) Regulations 2013.

Data Collection Requirements

To find out more about the data collection requirements placed on us by the Department for Education go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

What are your rights?

Parents and pupils have the following rights in relation to the processing of their personal data.

You have the right to:

- be informed about how Holy Trinity School uses your personal data
- request access to the personal data that Holy Trinity School holds
- request that your personal data is amended if it is inaccurate or incomplete

- request that your personal data is erased where there is no compelling reason for its continued processing
- request that the processing of your data is restricted
- object to your personal data being processed.

Where the processing of your data is based on your consent, you have the right to withdraw this consent at any time.

If you have a concern about the way Holy Trinity School and/or the DfE store and use your personal data, you can raise a concern with the Information Commissioner's Office (ICO). The ICO can be contacted on 0303 123 1113, Monday-Friday 9am-5pm.

Where can you find out more information?

If you would like to find out more information about how we and/or the DfE collect, use and store your personal data, please visit our website www.holytrinityschsunningdale.co.uk to view our GDPR Data Protection Policy.