



**PRIVACY NOTICE: Pupils and Parent/Carer**

**ADOPTED: Spring Term 2026**

**REVIEW PERIOD: Annually**

**REVIEWER: Data Protection Officer**

## 1. What this privacy notice is for

All schools including Three Towers (TTAPA) collects, holds, uses and shares information about learners and their families. Much of the information collected is classed as '**personal data**' and the use of it is covered by a set of rules called the General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025.

For the purpose of Data Protection legislation, the Rowan Learning Trust (TLRT) is the data controller and is registered as such with the Information Commissioner's Office (ICO). They control data:

*To run the academies/schools and help learning and achievement, the school collects and uses information about learners.*

You have rights around the data we have collected including how and why we are processing it.

**Processing** data means anything that we do with it, such as collecting, storing, using, sharing and disposing of it.

This document tells you more about:

- The information we collect
- What we use the information for
- How your information is stored and how long we keep it
- What rights you have to the information

## 2. The types of information that we may process

We may process the following types of data relating to our learners and their families:

- Full legal name of Learner, any preferred names, date of birth, unique student number (UPN) and contact details including home address
- Details about their family (names of family members, names of other children, who to contact in an emergency, contact details, email addresses, National Insurance numbers etc)
- Admission records including any previous schools attended
- Attendance and absence records (sessions attended, number of absences and reasons for absence)
- Behavioural information (such as details of how the learner behaves; how we manage learner's behaviours; suspensions and exclusions; any alternative provision put in place)
- Academic progress and attainment, including internal assessment results and external test/exam results completed whilst at school
- Medical conditions we need to be aware of, including SEND, mental and physical health
- Personal care records (toileting, changing needs, eating habits, food intake and sleep monitoring)
- Safeguarding information including notifications from the police, court orders and/or social care involvement
- Information about plans for career or post 16 education choices including destination data (where they ultimately go to after leaving school, for example, college, university, apprenticeship, employment etc)
- Post 16 learning information

- Extra-curricular and enrichment participation, including details about trips and visits, and relevant consents
- Information about supporting their learning
- Closed circuit television (CCTV) data
- Photographs
- Records of communications such as emails, phone messages, letters and complaints.
- Records of visits made by family members to the school, such as the date and time of the visit, and who was visited
- Files, messages, documents and artwork/coursework the learner has produced
- Records of discussions with members of staff
- Information about consultation with other professionals/agencies
- Records of any school equipment loaned to the learner
- Records of learner's use of Trust and school devices and networks as part of our safeguarding procedures
- Information about any care or contact orders relating to the learner
- Information about the parent/carer's employment, social and financial situation
- Banking details for the parent/carer (a credit or debit card registered with our payment system)
- Records of transactions in our payment system

### **3. Special category data (Sensitive Information)**

Some of the data is particularly sensitive and we are required to give greater protection to it and how we process it. This is known as special category personal data. In relation to our learners and their families we hold the following special category data:

- Characteristics (including ethnicity and home language)
- Safeguarding information (such as court orders and/or professional involvement)
- Special Education Needs,
- Medical conditions that we need to be aware of (including your doctor's information, child health, dental health, allergies and dietary requirements, medications)
- Health conditions, including any disabilities
- Eligibility for free school meals
- Other funding information (eg Student Premium, High Needs Funding and CLA funding)
- Some of our academies (not all) process Biometric data in order to identify learners, such as their thumb print for catering services / access to systems

#### 4. Why we collect and use your information

Under the DUAA, the Trust must demonstrate that all purposes for the collection and use of student and family data are proportionate, necessary, and properly documented as part of strengthened public-sector accountability requirements.

##### Learners:

We collect and use the information to:

- determine if a referral is appropriate and can be accepted
- support the admissions process
- support learning
- monitor and report on academic progress
- enable them to take part in tests/exams
- keep children safe
- provide appropriate pastoral care
- help us manage any health conditions that may affect your learning
- meet the legal duties placed upon us by the Department for Education
- comply with the law in general
- comply with our legal obligations to share information
- assess/check the quality of our services
- keep our sites safe and secure
- protect against fraud
- streamline systems; and
- for evaluation/research purpose

Photos of learners are used for identification purposes (safeguarding), and celebration purposes (to record work, classes and academy events)

##### Family Information:

We collect and use information about our learners' families to:

- to support the admission and induction process
- to support the child's learning
- to ensure we receive the correct funding for learners that attend our nurseries
- to maintain a safe environment for our learners, staff, parents/carers and families
- to provide appropriate pastoral care
- for safeguarding and welfare purposes
- for communication and reporting purposes
- to keep families informed about events and emergencies
- to process payments
- to enable free school meals to be provided
- to fulfil our legal obligations
- to gather feedback about our work

## Recognised Legitimate Interests (Article 6(1)(ga))

Under the Data (Use and Access) Act 2025, we may process student and family data where necessary for pre-approved public-interest purposes, such as safeguarding, preventing or detecting crime, or fulfilling regulatory obligations. This lawful basis removes the traditional balancing test but still requires proportionality and transparency.

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

- Article 6(a) – Consent (for anything which does not fall into the purposes explained below)
- Article 6(c) - Compliance with our legal obligations as set out in the Education Act 1996 (as amended). We are required to share information about our learners with the (DfE) under regulation 3 of The Education (Information About Individual Students) (England) Regulations 2013. In addition, there are extensive statutory obligations that a school is subject to – further details about these are available from our Data Protection Officer.
- Article 6(e) - Being necessary for us to carry out tasks that are in the Public Interest

Depending on the purpose, our use of your information will be legal due to one of the following:

- Informed consent given by you or your parent/carer or legal guardian [Article 6(1)(a)]  
For example: The use of your photographs on our website
- To meet a legal requirement [Article 6(1)(c)]  
For example: Providing information for the Education Department Census
- To protect the vital interests of you or someone else [Article 6(1)(d)]  
For example: Giving your family details to emergency services
- Delivering a public task [Article 6(1)(e)]  
For example: Recording your attendance at school each day

The ways we collect and use special category learner and family information are lawful based on:

- Explicit consent
- For compliance with certain legal obligations
- For exercising certain legal rights
- For protecting a person's vital interests in an emergency
- For health and public health reasons
- For carrying out tasks that are in the substantial public interest including for safeguarding purposes.

Where we use special category data, our use is legal due to one of the following reasons:

- Explicit informed consent given by you or your parent/carer or legal guardian [Article 9(2)(a)]  
For example: Sharing your information with the Educational Psychologists if we feel you need to be referred to them
- We are legally obliged to collect and use it [Article 9(2)(b)]  
For example: Information about your ethnic origin or any disability
- To protect the vital interest of you or someone else [Article 9(2)(c)]  
For example: Giving detail of health conditions to the emergency services

- Because it is part of delivering a public service [Article 9(2)(g)]

For example: Holding data on any medical condition so that we can help you manage it

**Marketing purposes** - Where a family member gives us consent, we may send them marketing information by text message or email, such as for promoting school events, campaigns or charities.

**Consent can be withdrawn at any time by contacting us (see the Contacts section)**

**Automated decision making & profiling** - We do **not** use any personal information to make automated decisions about our learners or their families, or to profile them. If automated or algorithmic systems that significantly affect students or families are introduced in future, we will update this notice to explain the decision-making logic and your right to request **human review**, in line with DUA requirements.

## 5. How we collect this information

We collect learner information via:

- Admission forms completed by parents/carers when a learner joins the school;
- Data collection forms;
- CCTV cameras;
- Information provided from our day-to-day interactions with learners;
- Other information provided by:
  - Parents/carers and other family members;
  - Previous and/or current school or provision;
  - The local authority;
  - The NHS;
  - External agencies eg police, social care;
  - The Department for Education;
  - By secure file transfer - Common Transfer File (CTF) from previous school

We sometimes audio/ video record sessions/lessons/assessments for learner or staff development and assessment. This will generate personal data including learner images, names, contributions, and will be protected, processed, and retained in the same way as all personal data, in line with our Data Protection Policies.

While the majority of information we collect about learners is mandatory, there is some information that can be provided voluntarily. When we ask for information, we will always make it clear to you whether you are required to provide the information and your rights in relation to this including explaining the possible consequences of not complying.

## 6. Storing your data

The DUAA requires all public-sector organisations to maintain strengthened governance and accountability measures, including documented processing activities, transparent data-sharing decisions and evidence of staff data-protection training. The Trust maintains these measures as part of its statutory obligations.

Some of the personal data that we collect and use/process is stored in the Trust's Microsoft 365 account. This is a cloud-based platform with personal data being held on Microsoft servers based within the EU. Other data, depending on why we use it will be kept on other systems (see Section 8) or in paper files which are held in secure storage. We also use email to enable authorised users to transfer information to one another. These emails are always encrypted.

Most of the personal data that we collect and use is added to your Educational Record. We maintain this record while you attend our school. When/if you leave then your record will be treated as follows:

- If you move to another school, we will transfer a copy of your records to your new school eg moving from primary to secondary school or if you move house, it is transferred to the local authority where you have moved to;

We only keep the information for the length of time we need it for, as shown in our data retention schedule. For example, if you leave at the end of your compulsory education (secondary learners who leave at the end of Y11) we retain a full copy of your record until your 25<sup>th</sup> birthday.

Some personal data is kept for different lengths of time. For example:

- Detailed information about your daily attendance is kept for three years;
- Information about free school meals is kept for the current year and 6 years afterwards
- If your school record contains information about SEND requirements, then your file will be retained until your 35<sup>th</sup> birthday;
- Records of your admission to the school are kept permanently. We do this as learners often ask us to confirm the dates they attended an school.

We dispose of all personal information securely when we no longer need it.

If you'd like to know how long we keep a specific piece of personal data, please contact the Data Protection Lead whose details can be found at the end of this Privacy Notice.

## 7. Requesting access to your personal data and other rights

Right of Access - you have the right to access/view the personal data that we hold about you, to receive a copy of the data and to be given more information about the data including any transfer to countries who do not fall under the requirements of the GDPR. Some information we hold cannot be accessed in this way. If you ask for information that is not available, there may be other ways of accessing it and we can help you.

**To have access to your personal data we will need to collect details of what you want and in the first instance you can contact the Data Protection Lead whose details can be found at the end of this Privacy Notice.**

You also have the right to:

- **be informed** about the collection and use of their personal data
- **correction** - have inaccurate personal data changed, or completed if it is incomplete
- **be forgotten** - have your data erased, often known as the 'right to be forgotten'; however this does not apply where, amongst other things, processing is necessary to comply with a legal obligation
- **restriction** - limit the way we are using their information, although, as above this is a limited right
- **objection** - object to the way we are using their information; though other than for marketing purposes, this is also limited as above.

### **Subject Access Requests under the DUAA 2025**

When responding to a subject access request, the Trust conducts only **reasonable and proportionate** searches, as required by the DUAA.

We may **pause the statutory timeframe** if identity verification or scope clarification is required, and you will be notified if this happens.

### **Other Rights you have**

Learners and their families also have rights in relation to automated decision making and profiling, though these are not currently relevant as we do not carry out automated decision making or profiling.

Right to withdraw consent - where we rely on your consent to collect and use personal data, you have the right to withdraw that consent. This applies if you change your mind, or you are unhappy with our use of your personal data. **Withdrawing your consent will need to be recorded in writing, please contact the Data Protection Lead at school.** Once we receive this, we will stop using your data.

**Right to complain** - Data Protection Complaints Process (mandatory under DUAA 2025) (Updated for DUAA 2025)

Before raising a concern with the ICO, the DUAA 2025 requires that you first use the Trust's internal data-protection complaints procedure. To make a complaint:

- contact the Data Protection Lead in the first instance;
- if unresolved, the matter will be considered under the Trust's internal data-protection complaints procedure;
- you may then escalate to the ICO once the internal process is complete.

### 7.1 Parents'/Carer's rights to access your personal data

In some cases, parents can make the request on the learner's behalf, although this will be subject to the learner's consent if they are deemed to be competent to understand the request and any implications. We usually say that children aged 12 and over are competent to understand, unless we have evidence to the contrary. This means that:

7.1.1 For learners under 12 years of age, we will usually ask your parents/carers to confirm that you can access the personal data. We will also provide your personal data to your parents/carers if they request it.

7.1.2 For learners aged 12 years and over, we will usually consider that you can make decisions about your personal data. This means that in most cases you can request access to your personal data and we will not ask your parents for their permission. It also means that we will not normally release your personal data to your parents/carers without your permission.

There may be occasions where we need to provide personal data to your parents/carers without your consent. These are likely to occur if there is a concern about your safety and welfare. We may also release personal data if your behaviour creates concern for the safety or progress of others.

We will still need to ask permission from your parents/carers for you to take part in some school and extra-curricular activities. The requirement for this permission overrides the protection of your personal data.

We are legally required to provide parents/carers with an annual report of their child's progress at school. We will offer the opportunity for parents/carers to come into school to discuss this report with your teachers and other members of staff.

## 8. Sharing your personal data

All sharing of student and family information is assessed for necessity, proportionality, and compliance with enhanced DUAA transparency and governance requirements.

At times we will share your personal data with other organisations and people. We will only do this when we are legally required to do so, when our policies allow us to do so or when you have given your consent.

Examples of people we share personal data with are:

- Family, associates and representatives of the person whose personal data we are processing who are authorised to receive the data;
- Other schools (former schools/feeder school or schools learners attend after leaving us);
- Local Authority (LA) (to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions)
- Our Local Governing Committee (LGC) and/or Trust Board
- Youth Support Services
- Careers service
- Our suppliers and service providers e.g. our vocational placement & work experience providers
- Employers/training providers where references are required

- The Department for Education, including Learner Record Services, the National Student Database and the Teaching Regulation Authority
- Examining bodies
- NHS (agencies and services) including CAHMS, Speech and Language, School Nurse and other healthcare organisations (to meet our legal obligations to share certain information, including safeguarding or as vital interest)
- Police and/or Courts
- Voluntary and charitable organisations
- Our regulator Ofsted (to meet our statutory obligations to report information such as census data and assessment data)
- Financial organisations e.g., the Educational Skills and Funding Agency (to enable us to meet our statutory requirements for finance and audit, for reporting purposes)
- Press and the media
- External systems used by school (and our Trust) to carry out day-to-day processes and requirements. For example, but not limited to:
  - Arbor – our MIS system
  - CPOMS – our safeguarding system
  - Microsoft 365 and TEAMS
  - Edukey (ClassCharts)
  - Evolve
  - Wonde
  - Seneca
  - School photographer
  - Social media platforms such as X, Instagram and Facebook

Where we share your personal data with someone who is a supplier or service provider, we have taken steps to ensure that they treat your personal data in a way that meets the requirements of the GDPR.

#### 8.1 International Transfers

When transferring personal information outside the UK or EEA, the Trust applies the DUAA "data protection test," ensuring that the level of protection in the destination country is **not materially lower** than that in the UK. Safeguards such as International Data Transfer Agreements will be used where required.

Personal information may be transferred outside the UK and the European Economic Area ('EEA'), including to the United States. Where information is transferred outside the UK or EEA to a country that is not designated as "adequate" in relation to data protection law, the information is adequately protected by the use of International Data Transfer Agreements and security measures, and other appropriate safeguards. For more information on international transfers please contact us to speak to our Data Protection Officer

## 8.2 Freedom of Information Act and environmental Information Regulations 2004

As a public body, both TTAPA and our Trust are subject to requests made under the above legislation. However, we will never disclose personal data in our responses to these requests where to do so would contravene the principles of data protection.

## 9. Why we regularly share learner information

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

### 9.1 Youth support services and Careers Advisors

Once our learners reach the age of 13, we are legally required to pass on certain information about them to the Local Authority in which the school is located, as it has legal responsibilities regarding the education or training of 13–19-year-olds under section 507b of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers

A parent/carer can object to any information in addition to their child's name, address and date of birth being passed to their local authority or provider of youth support services by informing us. This right is transferred to the learner once they reach the age of 16.

Once they reach the age of 16, a learner can object to only their name, address and date of birth is passed to their local authority or provider of youth support services by informing us.

Data is securely transferred to the youth support service via secure under the terms of a Data Sharing Agreement with the relevant local authority.

For more information about services for young people, please visit our local authority website.

### 9.2 Local Authorities

We may be required to share information about our learners with the local authority to ensure that they can conduct their statutory duties under the Schools Admission Code, including conducting Fair Access Panels.

All secondary schools, including TTAPA collect information on intended destinations (where a learner goes and what they do after leaving school), and pass it on to their local authorities, so that the local authorities can fulfil their requirement to ensure young people have an education or training placement for the September after they finish Key Stage 4. This is recorded on the National Client Caseload Information System (NCCIS) for the Department for Education and for local authorities.

**A link to our local authority's Privacy Notice is on our website**

### 9.3 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 learners with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections.

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.

## **10. How Government use your information**

The learner 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 Student 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)

There is a link on our website to the DfE's

### 10.1 Data collection requirements

We are required to provide information about learners to the Department for Education as part of statutory data collections such as the school census and early year's census under regulation 5 of The Education (Information About Individual Learners) (England) Regulations 2013.

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 [Data collection and censuses for schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/collections/data-collection-and-censuses-for-schools)

### 10.2 The National Student Database (NPD)

Much of the information collect from schools is then stored in the National Learner Database (NPD), which is owned and managed by the Department of Education and provides evidence on school performance to inform research. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department.

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.

### 10.3 Sharing by the Department

The law allows the Department to share learners' 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: [How DfE shares personal data - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/how-dfe-shares-personal-data)

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

For information about which organisations the Department has provided learner information to, (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>

### 10.4 Learner Records Service

The Learning Records Service does not process data about our primary learners. However, for all other learners, the information you supply is used by the Learning Records Service (LRS). The LRS issues Unique Learner Numbers (ULN) and creates Personal Learning records across England, Wales and Northern Ireland, and is operated by the Education and Skills Funding Agency, an executive agency of the Department for Education (DfE). For more information about how your information is processed, and to access your Personal Learning Record, please refer to: <https://www.gov.uk/government/publications/lrs-privacy-notices>

### 10.5 How to find out what personal information the 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: [Personal information charter - Department for Education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/personal-information-charter-for-the-department-for-education)

To contact the DfE please visit: [Contact the Department for Education \(DfE\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/organisations/department-for-education/contact-us)

## **11. Updates to this privacy notice**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was approved in November 2024. This notice will be updated in line with ICO guidance on the Data (Use and Access) Act 2025, expected throughout 2026.

## **12. Who to contact**

The School has the responsibility to ensure that your personal data is protected. If you have a concern about the way we are collecting or using your personal data, or you have any questions about this privacy notice, we request that you raise your concern with us in the first instance. We recommend that you contact the data protection lead (DPL):

Name of Person: Ellen Palmer  
Email address: [e.palmer@hhhs.net](mailto:e.palmer@hhhs.net)  
Contact number: 01942 204640  
Address: Carr Lane, Wigan, WN3 5NY

Trusts are also required to have someone called a Data Protection Officer or DPO. The DPO advises the Trust about issues to do with data protection, but can also help you, if you have a problem.

Our Data Protection Officer is:

Name of DPO: GDPR Sentry Limited  
Email address: [support@gdprentry.com](mailto:support@gdprentry.com)  
Contact number: 0113 804 2035  
Address: Unit 434 Birch Park, Thorp Arch Estate, Wetherby, West Yorkshire, LS23 7FG

If you are dissatisfied with our response to your concerns, you can contact the ICO (contact details below) quoting our ICO registration number Z3180736 and stating that the Data Controller is The Rowan Learning Trust.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire  
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545745 if you prefer to use a national rate number

Website: <https://ico.org.uk/concerns/>