

# Privacy Notice for Parents and Pupil - Rugby Free Primary School

## How we use your information

**2025/26**

### Who are we?

Triumph Learning Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Triumph Learning Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: ZA138738.

You can contact the Academy Trust as the Data Controller in writing at:

Triumph Learning Trust

Rugby Free Secondary School

Anderson Avenue

CV22 5PE

Or

[enquiries@triumphlearning.org](mailto:enquiries@triumphlearning.org)

### What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our pupils and parents.

### What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the

purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

## **What personal information do we process about pupils and parents?**

The pupil and parent information that we collect, hold and share includes:

- Personal information including a pupil's name, date of birth, unique pupil number and home address
- Characteristics such as ethnicity, language, nationality, country of birth and free school meal eligibility
- Attendance information such as sessions attended, number of absences and absence reasons
- Admissions information
- Educational information including records of work, assessment results, relevant medical information, details of pupils' special educational needs, exclusions/behavioural information, post-16 learning information
- Contact information for parents, carers and other relatives, including telephone numbers, home addresses and e-mail addresses
- Information about a child's home life, where required as part of necessary safeguarding and welfare processes
- CCTV recordings in common areas

## **Why do we use personal information?**

We use pupil data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Assess the quality of our services
- Comply with the law regarding data sharing
- Safeguard pupils
- Administer admissions waiting lists
- Carry out research
- Share medical information with health professionals

## **Collecting pupil information**

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

## What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

### 1) To comply with the law

We collect and use general purpose pupil information in order to meet certain legal requirements and legal obligations placed upon the Academy Trust by law. We therefore are required to process personal information for such purposes even if you have not consented to us doing so.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact the Academy Trust in writing.

### 2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

### 3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

### 4) To perform a public task

It is a day-to-day function of the Academy Trust to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that pupils are properly educated and supported.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

In certain circumstances, an individual has the right to object to any processing where it is likely to cause or is causing harm or distress. To exercise this right, individuals should do so by contacting the Learning Today Leading Tomorrow to

inform them of their reasons for the objection. These reasons should relate to your specific circumstances. Upon receipt of an objection, the Learning Today Leading Tomorrow will consider the reasons for the objection and balance this against the legitimate grounds to process data.

#### 5) We have a legitimate interest

Occasionally we have reasons to process information which fall outside of our usual day-to-day school functions. Details of the type of processing that we may undertake on this basis are set out in Table 5.

In certain circumstances an individual has the right to object to any processing where it is likely to cause or is causing harm or distress. To exercise this right, individuals should do so by contacting the Learning Today Leading Tomorrow to inform them of their reasons for the objection. These reasons should relate to your specific circumstances. Upon receipt of an objection, the Learning Today Leading Tomorrow will consider the reasons for the objection and balance this against the legitimate grounds to process data.

### Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- Explicit consent of the data subject
- Processing relates to personal data which is manifestly made public by the data subject
- Necessary for establishing, exercising or defending legal claims
- Necessary for reasons of substantial public interest
- Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of special category personal information data that we process is set out in the tables attached.

### Who might we share your information with?

We routinely share pupil information with:

- Schools that the pupils attend after leaving us
- Our local authority
- The Department for Education (DfE)
- Local Public Health Team
- Public Health and other public health agencies
- Information Management software: Bromcom, CPOMS, Medical Tracker
- Education/Classroom apps: SeeSaw, Maths Circle, Readtheory, Primary PE Passport, Jigsaw, School Library

#### Systems

- ABM (outsourced catering service) and Game On (external sports coach service)
- Local Services including Rugby Food Bank, the local Compass Team at Warwickshire County Council, the local educational psychologist team and Warwickshire Education Services
- Conferencing software for homework and home learning: Zoom

We do not share information about our pupils or parents unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

#### **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>.

#### **What do we do with your information?**

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. The Academy Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

#### **How long do we keep your information for?**

In retaining personal information, the Academy Trust has a [Records Management and Retention Policy](#). The schedules set out the Statutory Provisions under which the Academy Trust are required to retain the information.

#### **Transferring data internationally**

Where we transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law. We intend only to share to countries that have an adequacy decision. Where we share data to the USA, which includes SeeSaw, Microsoft Office and Zoom, we use Standard Contractual Clauses as a secure transfer mechanism, under Article 46 of the GDPR.

#### **What are your rights with respect of your personal information?**

Under data protection law, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or to have access to your child's educational record, contact the Trust directly via email at [tlt-sar@triumphlearning.org](mailto:tlt-sar@triumphlearning.org) or alternatively;

Triumph Learning Trust

Rugby Free Secondary School

TLT Privacy Notice Pupils, Parents and Carers

Last Update: September 2025

Anderson Avenue

Rugby

CV22 5PE

**\*\*Please ensure you specify which school your request relates to.**

In certain circumstances where the trust processes data for the purposes of legitimate interests or to fulfil their public task, individuals have a right to object to the processing where it is likely to cause, or is causing, harm or distress. When exercising this right, individuals should contact the trust to inform them of their reasons for their objection. The trust will consider the reasons for any objection and assess the risk to the individual against the purposes for the processing. In the event the trust is unable to comply with an objection, we will ensure we can demonstrate compelling legitimate grounds to continue with the processing.

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- Claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

**Table 1 – Personal information we are required to process to comply with the law:**

Information Type	Relevant legislation	Special Category–additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Special Education Needs Report and SEND Information	Children and Families Act 2014, Part 3 - schools have a duty to keep information on the child's needs and provide the appropriate support  Education Act 1996, Part 4 - duty to provide for pupils with special educational needs	Public Task, Vital Interest	Local Authority, DfE	Legal Obligation Children and Families Act
Attendance register	Education (Pupil Registration)(England) Regulations 2006, Regulation 4, 6, 10, 11 and 12	Public Task	OFSTED, Local Authority, future school	Legal Obligation
Common Transfer file	Education (Pupil Registration)(England) Regulations 2005, Regulation 6		School pupil transfers to	Legal Obligation
Safeguarding information	Education (Independent School Standards) Regulations 2014 - requirement to maintain safeguarding by writing up a risk assessment policy	Public Task	Local Authority, Next School	Legal Obligation
			CPOMS	Public Task
Admissions Register	Education (Pupil Registration) (England) Regulations 2006, Regulation 4, 5, 10, 11, 14 and 15		OFSTED, Local Authority	Legal Obligation
Curricular Record including Assessment and achievement data	The Education (Independent School Standards) Regulations 2014,	Public Task	OFSTED, Local School. Local Authority	Legal Obligation

	regulation 32(f) - requirement for independent schools to produce an annual report			
Educational Record	Education (Pupil Information) (England) Regulations 2005, Regulation 5 and 6		Parents, Local school	Legal Obligation
Pupil Information i.e name, age address, Emergency contact details	Education (Information About Education (Pupil Information) (England) Regulations 2005 - to keep a pupil educational record		Department of Education – school census. Other schools – when pupils transfers	Legal Obligation
Medical Information including conditions, allergies, disabilities and dietary requirements	Legal Obligation Children and Families Act 2014, section 100 - schools have a duty to support pupils with a medical condition	Necessary for preventative or occupational medicine, Public Task, Vital Interest	Department of Education – school census. Other schools – when pupils transfers	Legal Obligation
			ABM Catering (dietary requirements/allergies)	Public Task
School Census	Education Act 1996, Sections 537 & 537A, and accompanying regulations		Department of Education	Legal Obligation
Ethnicity	Legal Obligation Education Act 1996, Section 537A - to complete the school census	necessary for archiving, research and statistics Public Task	Local Authority, DfE	Legal Obligation
			Bromcom and CPOMS	Public Task
Free School Meal Entitlement	Legal Obligation Education Act 1996, section 512 - requirement to provide free school meals if the pupil is eligible	Public Task	Local Authority, DfE	Legal Obligation Education Act 1996, section 512 - requirement to provide free school meals if the pupil is eligible Education Act 1996, Section 537A - to complete the school census
			Bromcom and CPOMS	Public Task

Pupil Premium Information	The Free School Lunches and Milk, and School and Early Years Finance (Amendments Relating to Universal Credit) (England) Regulations 2018 , Regulation 6 - qualifications to receive pupil premium The School Information (England) Regulations 2008, Schedule 4 Paragraph 9 - schools are required to publish pupil premium information on their website		Local Authority, DfE	Legal Obligation The Free School Lunches and Milk, and School and Early Years Finance (Amendments Relating to Universal Credit) (England) Regulations 2018 , Regulation 6 - qualifications to receive pupil premium Education Act 1996, Section 537A - to complete the school census
			Bromcom and CPOMS	Public Task
Exclusion Information	Legal Obligation School Discipline (Pupil Exclusions and Reviews) (England) Regulations 2012, Regulation 5 - the head teacher must inform the relevant people of the exclusion		Local Authority, Future School	Legal Obligation School Discipline (Pupil Exclusions and Reviews) (England) Regulations 2012, Regulation 5 - the head teacher must inform the relevant people of the exclusion, including LA
Accident Forms	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 - to keep records of any incidents		Local Authority, Medical Tracker	Legal Obligation
Previous School	Legal Obligation Education (Pupil Information) (England) Regulations 2005, Schedule 2 Paragraph 4-		Local Authority, DfE, Bromcom, Future School,	Public Task

	requirement to include this when pupil information is transferred to a new school as part of the common transfer file			
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**Table 2 – Personal information we are required to process as it is necessary to protect someone’s vital interests**

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Medical Information	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent’ Public Task, Legal Obligation	Medical staff i.e. paramedics/ambulance Medical Tracker	Vital Interest
Religious belief	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent’ Public Task	Medical staff i.e. paramedics/ambulance Medical Tracker	Vital Interest

**Table 3 - Personal information we are required to process with the consent of the individual to whom that information ‘belongs’**

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
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Photographs	Public Task	Government agencies, eg Department for Education, The Warwickshire Consortium Teaching School Social Media including Facebook, Twitter	Consent
		Bromcom	Public Task

**Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task**

Please note that the right to object applies to **some** of this processing, please see the section above that refers to ‘What are your rights with respect of your personal information?’

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Pupil Information i.e name, age, DOB, address, gender, EAL Status, Emergency contact details, year / class group		Department of Education – school census. Other schools – when pupils transfers	Legal Obligation
		Bromcom, CPOMS, ParentPay, Coolmilk, NHS, Educational Psychologist Team, Rugby Foodbank Compass, Warwickshire Education Services	Public Task
		(Name and class only) Maths Circle, Read Theory, SeeSaw, Primary PE Passport, Compass, School Library Systems, Jigsaw, ABM Catering, Game On	Public Task
Academic Progress data including Leuven data, wellcom data, Learning journals, staff observations		OFSTED, Parents, Health such as Speech and Language	Public Task & Legal Obligation
Safeguarding information, Medical, Special Education Needs		Local Authority, Health, Parents, Next School, Medical Tracker	Legal Obligation
		Bromcom, Medical Tracker	Public Task

Educational and Safeguarding Information used internally for the purpose of educating and protecting the welfare of children.		Bromcom and CPOMS	Public Task
Behaviour Information		CPOMS, Local Authority, Future School	Public Task

**Table 5 - Personal information we process because we have a legitimate interest.**

Please note that the right to object will apply to some of this processing, please see the section above that refers to ‘*What are your rights with respect of your personal information?*’

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information.	Lawful reason for sharing
Images captured on our CCTV system.	n/a	This is not shared routinely.	n/a