



'Life in all its fullness'

Privacy Notice

Policy owner	Head of ICT & Systems
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Privacy Notice

Applies to: All academies within Three Spires Trust

Who we are

Three Spires Trust is a data controller as defined by the UK GDPR. This means that we determine the purposes for which your personal data is processed and how it is processed. We will only collect and use your personal data in ways that are compliant with data protection legislation. The Trust has appointed GDPR Sentry as its Data Protection Officer (DPO). The role of the DPO is to monitor our compliance with the UK GDPR and the Data Protection Act 2018 and advise on data protection issues. If you would like to discuss this privacy notice or our use of your data, please contact our DPO via DPO@threespirestrust.org.

The personal data we collect and use

We process information relating to individuals who learn or work in, or are otherwise associated with, our academies. This includes:

- Names, addresses, contact details, and identifiers (e.g. UPN, staff ID)
 - Date of birth, gender, nationality, and language information
 - Academic records, assessment results, and attendance data
 - Behavioural, safeguarding, and welfare information
 - Special educational needs and disabilities (SEND) and medical data
 - Parent, carer, and emergency contact information
 - Employment and payroll information (for staff)
 - Images and recordings (for identification or promotional purposes)
 - Financial information, such as payment records or free school meal eligibility
 - Any other information required to fulfil our statutory duties or support educational provision
- We may also process certain **special category data** (such as health or ethnicity) where this is necessary for statutory or equality purposes.

Why we collect and use personal data

We collect and use personal information to:

- Support pupil learning, progress, and wellbeing
- Provide education, safeguarding, and pastoral care
- Comply with statutory obligations to the Department for Education (DfE) and local authorities
- Manage admissions, attendance, and examinations

- Recruit, train, and manage staff
- Maintain trust governance and financial records
- Communicate with parents, carers, and external partners
- Provide online learning and educational services
- Promote the Trust and its academies (where consent is given)

What is our lawful basis for processing your information?

Under the UK GDPR, it is essential to have a lawful basis when processing personal information. We normally rely on the following lawful bases:

- Article 6(1)(a) – consent
- Article 6(1)(c) - legal obligation
- Article 6(1)(e) - public task

If we process your personal data with your consent, you have the right to withdraw that consent at any time. If you change your mind or are unhappy with our use of your personal data, please let us know by contacting the school office. There may be occasions where our processing is not covered by one of the legal bases above. In that case, we may rely on Article 6(1)(f) - legitimate interests. We only rely on legitimate interests when we are using your data in ways you would reasonably expect.

Some of the information we collect about you is classed as special category data under the UK GDPR. The additional conditions that allow for processing this data are:

- Article 9(2)(a) – explicit consent
- Article 9(2)(g) - reasons of substantial public interest

The applicable substantial public interest conditions in Schedule 1 of the Data Protection Act 2018 are:

- Condition 6 - statutory and government purposes
- Condition 16 - support for individuals with a particular disability or medical condition
- Condition 18 - safeguarding of children and vulnerable people

Who do we obtain your information from?

We usually receive this information directly from you. However, we may also receive some information from the following third parties:

- Local Authority.
- Department for Education (DfE).
- Other educational settings previously attended.
- Ofsted.
- Health and/or social care providers.

- Police and/or other law enforcement bodies.

Collecting personal data

We collect data directly from individuals (e.g. through forms, enrolment, applications) or indirectly from other organisations such as previous schools, local authorities, or professional bodies. We ensure that only information necessary for our purposes is collected and that it is kept accurate and up to date.

Who do we share your personal data with?

We may share your information with the following organisations:

- Department for Education (DfE).
- Local Authority.
- Ofsted.
- Information Commission and/or Local Government Ombudsman.
- Service providers working on our behalf (e.g. IT, catering, payroll, safeguarding platforms)
- We may share information across the schools within our trust.

- Professional advisers and auditors
All third parties are required to process personal data in compliance with UK data protection law and under appropriate contractual safeguards.

- Examination boards and assessment providers

We may also share information with other third parties where there is a lawful basis to do so. For example, we sometimes share information with the police for crime detection or prevention.

Use of photographs, video, and media

The Trust and its academies use photographs and video recordings to celebrate achievements, record learning, and share news about school life. These may appear on school websites, newsletters, printed materials, and official social media channels. We will only use identifiable images of pupils or staff where we have obtained appropriate consent. Consent can be withdrawn at any time by contacting the relevant academy. Images are stored securely and retained in line with the Trust's Information Retention Schedule.

Artificial intelligence (AI)

We may use some systems and platforms that incorporate an AI function. Where we do this, we ensure that the data is held securely and is not used for training the AI model. AI does not make any automated decisions about individuals, and outputs are always subject to human oversight.

How we store personal data

Information is retained only as long as necessary, in accordance with the Three Spires Trust Information Retention Schedule. As a general guide, pupil records are typically retained for a period of 25 years after the pupil leaves the Trust, and staff records are typically retained for 6 years after employment ends. Some records, such as safeguarding records, may be retained for longer where required by law or statutory guidance. After the relevant retention period, information is securely deleted or destroyed. A copy of the full Information Retention Schedule is available on request from the school office or our DPO.

International transfers of data

Although we are based in the UK, some of the digital information we hold may be stored on computer servers located outside the UK. Some of the IT applications we use may also transfer data outside the UK. Usually, your information will not be transferred outside the United Kingdom. Where data is transferred to countries within the European Economic Area (EEA), this is covered by UK adequacy regulations, which recognise the EEA as providing an equivalent level of data protection. Where data is transferred to countries outside the EEA, we will ensure that appropriate safeguards are in place, such as an International Data Transfer Agreement (IDTA) or equivalent mechanism, in accordance with UK data protection law.

What rights do you have over your data?

Under the UK GDPR, you have the following rights concerning the processing of your data:

- to be informed about how we process your personal data. This notice fulfils this obligation.
- to request a copy of the personal data we hold about you.
- to request that your personal data be amended if it is inaccurate or incomplete.
- to request that your personal data be erased where there is no compelling reason for its continued processing.
- to request that the processing of your personal data be restricted.
- to object to your personal data being processed.
- receive a copy of the personal data you have provided to us in a structured, commonly used, and machine-readable format, and to request that we transfer that data to another organisation or directly to you (the right to data portability). This right only applies where our processing is based on your consent or on a contract, and is carried out by automated means.
- to not be subject to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects concerning you.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO using the details provided above.

If we cannot resolve your concerns, then you may also complain to the Information Commission, which is the UK's data protection regulator. Its contact details are below:

The telephone helpline (0303 123 1113) is open Monday to Friday between 9 a.m. and 5 p.m. (excluding bank holidays). Alternative methods to report, enquire, register, and raise complaints are available on the ICO's website [here](#).

Changes to this notice

We reserve the right to change this privacy notice at any time. We will typically notify you of changes that affect you. However, please check regularly to ensure you have the latest version. This privacy notice was last reviewed 21/11/2025

Freedom of Information

As a public authority, Three Spires Trust is subject to the Freedom of Information Act 2000. This means that certain information we hold may be disclosable in response to a written request. The Trust publishes a Publication Scheme setting out the classes of information we routinely make available. A copy of the Publication Scheme is available on request from the school office or from our DPO.