The LETTA Trust

Privacy Notice for Pupils

Bygrove · Columbia · Hermitage · Stebon · Virginia

Who we are

The LETTA Trust is the data controller for personal data processed across its schools: Bygrove Primary School, Columbia Primary School, Hermitage Primary School, Stebon Primary School and Virginia Primary School. In this notice, "we" means the Trust and the Trust school with which you have a relationship. The Trust is registered as a data controller with the Information Commission.

This notice explains how we collect and use personal data about pupils.

Data protection law means the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, each as amended by the Data (Use and Access) Act 2025, together with related legislation. The Trust's Information Governance Policy, available on the Trust website, sets out in full how we meet our obligations.

Our Data Protection Officer

Our Data Protection Officer (DPO) advises us on data protection law and monitors our compliance with it. If you have any questions about this notice or about how we handle your personal data, please contact the DPO at dpo@letta.org.uk.

What information we collect

The categories of pupil information we collect, hold and share include:

- personal identifiers – such as name, date of birth, address and unique pupil number
- characteristics – such as ethnicity, first language, nationality, country of birth and free school meal eligibility
- attendance information – such as sessions attended, number of absences and absence reasons
- assessment information – such as national curriculum assessment results and internal assessments
- relevant medical, dietary and allergy information

- information relating to special educational needs and disabilities (SEND)
- behavioural information – such as suspensions and exclusions
- safeguarding and welfare information
- photographs, videos and CCTV images

Most of this information is collected from pupils and their parents or carers. We may also receive information from a pupil's previous school, the local authority, the Department for Education (DfE) and health professionals.

Why we use this information and our lawful bases

We use pupil data to educate pupils and support their learning, monitor and report on progress, provide appropriate pastoral and medical care, meet the needs of pupils with SEND, safeguard pupils and promote their welfare, comply with our legal duties on admissions and attendance, complete statutory data returns such as the school census, and assess the quality of our provision.

Our lawful bases under the UK GDPR are: legal obligation, where processing is required by law, including the Education Act 1996 and the Education (Information About Individual Pupils) (England) Regulations 2013; public task, where processing is necessary to perform our official functions as a school; vital interests, in an emergency; and consent, for uses such as photographs for the school website or social media. As a public authority, we do not rely on legitimate interests for processing carried out in the performance of our public tasks. Where we process special category data, such as health or ethnicity information, we also rely on a condition under Article 9 UK GDPR and the Data Protection Act 2018, such as substantial public interest in safeguarding, the provision of health or social care, or explicit consent.

Where you provide data voluntarily rather than because the law requires it, we will tell you at the point of collection and, where consent is needed, explain what the data will be used for.

Photographs and videos

We take and use photographs and videos of pupils for different purposes, and the lawful basis depends on the use. For school administration, such as identification, registers and labels, we rely on our public task. For the school website, newsletters, displays visible to the wider community, social media and promotional materials, we rely on consent, which we ask parents and carers to confirm at the start of each school year and which may be withdrawn at any time. You may also object to administrative uses of your child's image, and we will offer a suitable alternative wherever practicable. We check consent records and safeguarding restrictions before any image is published, and pupil images are never manipulated or used to create synthetic or AI-generated imagery.

Who we share pupil information with

We only share pupil information where data protection law allows or requires it. We routinely share pupil information with:

- the local authority, to meet our legal obligations, including on admissions, attendance, safeguarding and SEND
- the Department for Education, through statutory data collections such as the school census
- a pupil's destination school when they leave us
- NHS health professionals, such as the school nursing service
- suppliers who process data on our behalf under contract, such as our management information system and curriculum platforms

From 30 September 2026, section 16LA of the Children Act 2004 places a statutory duty on schools to share information relevant to safeguarding or promoting the welfare of a child with certain other organisations where the statutory conditions are met. Where this duty applies, our lawful basis is legal obligation and consent is not required, although we will be open about such sharing wherever it is appropriate and safe to be so.

The school census information we provide to the DfE is held in the National Pupil Database (NPD). The DfE may share information from the NPD with third parties who promote the education or wellbeing of children in England, for example for research, statistics or guidance, and has processes in place to keep that data confidential.

How long we keep your information

We keep personal data only for as long as it is needed for the purposes for which it was collected, or for as long as the law requires. Retention periods are set out in the Trust's records retention schedule, which forms part of the Information Governance Policy.

Your rights

You have the right to:

- be informed about how we use your personal data
- request access to the personal data we hold about you – we will respond within one month of the relevant time, and where we reasonably need information to confirm your identity or to clarify your request, the time limit is paused until we receive it
- request that inaccurate or incomplete personal data is corrected
- request erasure of your personal data where there is no compelling reason for us to continue processing it
- request that our processing of your personal data is restricted
- object to our processing of your personal data, including processing we carry out in the performance of our public task

- data portability, where processing is based on your consent or a contract and is carried out by automated means

Where our processing is based on your consent, you may withdraw that consent at any time. We do not make decisions about you based solely on automated processing which have legal or similarly significant effects.

Complaints

If you are unhappy with how we have collected or used your personal data, please raise it with the DPO at dpo@letta.org.uk. We will acknowledge your complaint within 30 days, make appropriate enquiries, keep you informed of progress and tell you the outcome without undue delay, in line with section 164A of the Data Protection Act 2018.

You also have the right to complain to the Information Commission, whose office continues to be known as the ICO: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF; telephone 0303 123 1113; www.ico.org.uk.

This notice is reviewed annually. It was last updated in October 2026 to reflect the Data (Use and Access) Act 2025, the statutory safeguarding information-sharing duty in section 16LA of the Children Act 2004, and the establishment of the Information Commission.