



# Privacy Notice for Students

## Contents

1. Introduction .....	3
2. The personal data we hold .....	3
3. Why we use this data.....	3
4. Our lawful basis for using this data.....	4
5. Collecting this data .....	5
6. How we store this data. ....	5
7. Who we share data with .....	5
8. How to access personal information we hold about you. ....	6
9. Your other rights regarding your data .....	6
10. Contact Us .....	7
11. Complaints .....	7

## Document Control

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<ul style="list-style-type: none"><li>Annual review</li></ul>			
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<ul style="list-style-type: none"><li>Minor updates to reflect change in DPO role from CFOO to COO</li></ul>			
Feb 25	COO	CEO	Feb 25
<ul style="list-style-type: none"><li>Minor updates to reflect data sharing of ex pupils data to PCC in line with s72 ESFA 2008</li><li>Updates to reflect Mayfield School joining the Trust</li></ul>			

## **1. Introduction**

You have a legal right to be informed about how the Salterns Academy Trust and its schools use any personal data that we hold about you. We comply with this right by providing a 'privacy notice' to you where we are processing your personal data.

This privacy notice explains how we collect, store, and use personal data about **students at our schools**, like you.

The Salterns Academy Trust, Portsmouth is the 'data controller' for the purposes of data protection law. The Trust has three schools – Admiral Lord Nelson School, Mayfield School and Trafalgar School.

The Trust's Data Protection Officer is the Chief Operating Officer (see 'Contact us' below).

## **2. The personal data we hold**

We hold some personal information about you to make sure we can help you learn and look after you at school.

For the same reasons, we get information about you from some other places too – like other schools, the local council, and the government.

Personal information that we may collect, use, store, and share (when appropriate) about you includes, but is not restricted to:

- Your contact details.
- Your test results.
- Your attendance records.
- Details of any behaviour issues or exclusions

We may collect, use, store, and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Information about your characteristics, like your ethnic background or any special educational needs
- Information about any medical conditions you have
- Photographs and CCTV images

## **3. Why we use this data.**

We use the data listed above:

- Get in touch with you and your parents when we need to
- Check how you are doing in exams and work out whether you or your teachers need any extra help.
- Track how well the school is performing.
- Look after your wellbeing.

### **3.1 Use of your personal for marketing purposes**

Where you have given us consent to do so, we may send you messages by text or email promoting School/Trust events, campaigns, charitable causes, or services that may be of interest to you.

You can take back this consent or 'opt out' of receiving these emails and/or texts at any time by contacting us (see 'Contact us' below).

### **3.2 Use of your personal data in automated decision making and profiling**

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

## **4. Our lawful basis for using this data**

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation.
- We need it to perform an official task in the public interest.

Sometimes, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way.
- We need to protect the individual's vital interests (or someone else's interests)

Where you have provided us with consent to use your information, you may take back this consent at any time. We will make this clear when requesting your consent and explain how you can withdraw consent if you wish to do so.

### **4.1 Our basis for using special category data.**

For 'special category' data (more sensitive personal information), we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in data protection law:

- We have obtained your explicit consent to use your information in a certain way.
- We need to use your information under employment, social security, or social protection law.
- We need to protect an individual's vital interests (i.e., protect your life or someone else's life), in situations where you are physically or legally incapable of giving consent.
- The information has already been made obviously public by you.
- We need to use it to make or defend against legal claims.
- We need to use it for reasons of substantial public interest as defined in legislation.
- We need to use it for health or social care purposes, and it is used by, or under the direction of, a professional obliged to confidentiality under law.
- We need to use it for public health reasons, and it is used by, or under the direction of, a professional obliged to confidentiality under law.
- We need to use it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the use is in the public interest.

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

- We have obtained your consent to use it in a specific way.
- We need to protect an individual's vital interests (i.e., protect your child's life or someone else's life), in situations where you are physically or legally incapable of giving consent.
- The data concerned has already been made obviously public by you.
- We need to use it as part of legal proceedings, to obtain legal advice, or to make or defend against legal claims.
- We need to use it for reasons of substantial public interest as defined in legislation.

## **5. Collecting this data**

While most of the information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear if you must give it to us (and if so, what the possible consequences are of not doing that), or if you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local councils
- Government departments or agencies
- Police forces, courts, tribunals

## **6. How we store this data.**

We keep personal information about you while you are attending our school. We may also keep it beyond your attendance at our school if this is necessary. Our Records Management Policy sets out how long we keep information about students.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed.

We will dispose of your personal data securely when we no longer need it.

## **7. Who we share data with**

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required or necessary (and it complies with data protection law), we may share information about you with:

- Portsmouth City Council – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions and information in relation to destination data for current students (year 11) and ex-students (year 12 & 13) .
- Government departments or agencies
- Our youth support services provider.
- Ofsted
- Suppliers and service providers, such as the school meals caterer
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

## **National Pupil Database**

We must provide information about you to the Department for Education (a government department) as part of data collections such as the school census.

Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.

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 third parties, such as other organisations which promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use the data.

You can find more information about this on the Department for Education's webpage on how it collects and shares research data.

You can also contact the Department for Education if you have any questions about the database.

## **8. How to access personal information we hold about you.**

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that apply):

- Give you a description of it.
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data (decisions made by a computer or a machine, rather than by a person), and any consequences of this.
- Give you a copy of the information in an understandable form.

You may also have the right for your child's personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

## **9. Your other rights regarding your data**

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Say that you do not want your personal information to be used.
- Stop it being used to send you marketing materials.
- Say that you do not want it to be used for automated decisions (decisions made by a computer or machine, rather than by a person)
- In some cases, have it corrected if it is inaccurate.
- In some cases, have it deleted or destroyed, or restrict its use.
- In some cases, be notified of a data breach.
- Make a complaint to the Information Commissioner's Office
- Claim compensation if the data protection rules are broken and this harms you in some way.

To exercise any of these rights, please contact us (see 'Contact us' below).

## **10. Contact Us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer:

Robin Parr (Chief Operating Officer, Salterns Academy Trust)

Salterns Academy Trust, c/o Admiral Lord Nelson School, Dundas Lane, Portsmouth, PO3 5XT

Email [rparr@salternstrust.co.uk](mailto:rparr@salternstrust.co.uk)

## **11. Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please let us know first.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF