

TITLE: ALET Student Privacy Policy	REF: GOV005.1	VERSION: 2
APPROVAL BODY: Policy Committee	DATE: 01/02/2022	REVIEW DATE: 01/03/2023
LEAD PERSON: Data Protection Officer		
VERSION	REVIEWER/APPROVAL	REVIEW NOTES
1.		New Policy
2. 01.02.2022	Policy Committee/DP Committee	Full Review

ALET STUDENT PRIVACY POLICY

1. Introduction

Under data protection laws, individuals have a right to be informed about how our trust uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store, and use personal data **pupils at our schools**.

We, Activate Learning Education Trust, Oxpens Road, Oxford OX1 1SA 01865 551025, are the 'data controller' for the purposes of data protection law as defined by the UK General Data Protection Regulation and Data Protection Act 2018.

Our data protection officer is Heledd Walker, Head of Governance and Compliance (see 'Contact us' below).

2. The personal data we hold

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

- Personal information (e.g., name, unique learner number, date of birth, contact details, address, gender, parent/guardian details, household income where relevant)
- Characteristics (e.g., residency status, nationality, ethnicity, religious beliefs and other protected characteristics)
- Attendance Information (e.g., classes attended, number of absences, absence reasons).
- Educational records (e.g., class progress, assessment results, predicted grades, behavioural sanctions, targets set and achieved, previous education attainment).
- Medical information (e.g., health information, medical conditions, educational healthcare plans, support required, disability details).
- Other activity information (e.g., photographs and CCTV images captured, IT accounts, work or documents created during your studies).
- Safeguarding Information (e.g., disclosures made, personal circumstances, pastoral support given).

3. Why we use this data

We use the data listed above to:

- a) Support your learning at our school;
- b) Monitor and report on your progress;
- c) Provide appropriate guidance and pastoral support;
- d) Comply with the law regarding data sharing;
- e) Keep you safe while at school;

- f) Keep you informed about issues relating to the school;
- g) Assess and improve the quality of our teaching;
- h) Record and showcase the work of our schools.

3.1 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 to explain the processing to you, including your right to object to it.

4. Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

- Public task basis – we need to process data to fulfil our statutory function as a school.
e.g. Supporting the learning of pupils, recording and monitoring progress.
- Legal obligation’ basis – we need to process data to meet our responsibilities under law
e.g., Safeguarding and reporting to local authorities.
- Vital interests’ basis – we will use this personal data in a life-or-death situation
e.g., Medical information
- Contract’ basis – we need to process personal data to fulfil a contract with you or to help you enter into a contract with us.
e.g., Disciplinary and attendance information.

4.1 Our basis for using special category data

For ‘special category’ data, 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 need to protect an individual’s vital interests (i.e. protect your life or someone else’s life), in situations where you’re physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise, or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law

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 need to protect an individual’s vital interests (i.e. protect your life or someone else’s life), in situations where you’re physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise, or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting this data

While the majority of 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 whether you must provide this information (and if so, what the possible consequences are of not complying), or whether 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 authorities
- Government departments or agencies
- Police forces, courts, tribunals
- Previous schools
- Your parent/legal guardian

6. How we store this data

We keep personal information about you while you are at our school. We will also keep it beyond your attendance at our school. Our record retention schedule and records management policy set out how long we keep information about you.

We will retain most of your personal information until you reach the age of 25. Data which we will hold for a shorter period of time is listed below:

- Attendance registers are kept for a period of 3 years from the end of the academic year that they are taken.
- Work set and completed on our internal and online learning systems are kept for a period of 1 year from the end of the academic year that they are completed.
- Information relating to your IT account is kept for a period of 1 year following the account closure.
- Examination scripts and coursework which form part of your official grades are kept for varied periods of time, depending on our agreements with the examination bodies.

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 securely dispose of your personal data when we no longer need it in accordance with our retention schedule.

7. Who we share data with

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

- Local authorities – to meet our legal obligation to share information with it, such as for safeguarding concerns
- Government departments or agencies
- Police forces, courts, tribunals
- Previous schools
- Awarding organisations to allow us to claim certification
- External software companies
- IT Support and security services

- UK Visas and Immigration Department if you are studying on a Tier 4 visa
- Your parent/legal guardian

8. Your rights

8.1 How to access personal information that we hold about you

Under the data protection regulation, you have the right to request access to their personal information that we hold about you, this would be done via a subject access request.

You have the right to:

- Submit a subject access request.
- Being informed of the identity of the controller, the reasons for processing their personal data and other relevant information necessary to ensure the fair and transparent processing of personal data.
- 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, and destroyed.
- Claim compensation for damages caused by a breach of the data protection regulation.

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

If you would like to make a request, please contact us DPO@alet.org.uk.

9. 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 raise this with us in the first instance via DPO@alet.org.uk.

If you feel that your complaint is not adequately resolved, 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

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**:

Our data protection officer is:

- Heledd Walker DPO@alet.org.uk