Pupil and Parent Privacy notice for Seahaven Academy, a United Learning Trust Academy

This notice is intended to provide information about how the Academy will use or "process" personal data about individuals including current, past and prospective pupils and their parents, carers or guardians (referred to in this notice as "parents").

Responsibility for Data Protection

The data controller for personal information held by Seahaven Academy is United Learning Trust (ULT). ULT is registered with the Information Commissioner's Office (ICO). The registration number is Z7415170.

The Company Secretary, Steve Whiffen, is responsible for ensuring that ULT complies with the Data Protection Law. He can be contacted on company.secretary@unitedlearning.org.uk or 01832 864538.

Mrs S Pitts is responsible for ensuring that the Academy complies with ULT's policies and procedures in relation to Data Protection. They can be contacted at the school – email pittss@seahavenacademy.org.uk

The purposes for which we process pupil and parent personal data

Seahaven Academy and United Learning Trust collect, create and hold personal information relating to our pupils and may also receive information about them from their previous school, local authority and/or the Department for Education (DfE). We also collect and hold personal information about our pupil's parents and carers. We use this personal data to:

- Provide education services (including SEN), career services and extra-curricular activities to pupils; monitor pupils' progress and educational needs;
- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care.
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils at the school.
- To maintain relationships with alumni and the school community.
- For the purposes of management planning and forecasting, research and statistical analysis and to enable ULT to monitor the Academy's performance.
- To monitor use of the Academy's IT systems in accordance with the school's Acceptable Use Policy.
- To receive information about current and prospective pupils from any educational institution that they attended.
- To confirm the identity of prospective pupils and their parents.
- To make use of photographic images of pupils in school publications, on the school website in accordance with the Academy's policy on taking, storing and using images of children.
- To create invoices and process payments for services such as school meals, school trips etc.
- For security purposes, and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations.
- To receive reports from any organisation that may be working with your child.
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the Academy.
- To keep you updated about the activities of the Academy including by sending updates and newsletters by email and post.
- To organise trips and visits both in the UK and abroad.

The categories of personal data held about pupils

The types of personal data processed by the school will include:

1. Names, addresses, telephone numbers, email addresses and other contact details.
2. Academic records and national curriculum assessment results, including examination scripts and marks.
3. Personal characteristics such as your ethnic group, religious beliefs, any special educational needs you may have and any relevant medical information.
4. Attendance information, behavioural records, any exclusion information.
5. Information provided by previous educational establishments and or other professionals or organisations working with pupils.
6. Where pupils go after they leave the Academy.
7. For pupils enrolling for post 14 qualifications, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about your learning or qualifications.
8. Images captured by the Academy's CCTV system (in accordance with the school's CCTV policy on taking, storing and using images of children).

The legal basis for the processing of pupil and parent data

The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller and where necessary to comply with our legal obligations.

Information relating to racial or ethnic origin, religious beliefs or health (point 3) will only be processed with the explicit consent of the pupil or the pupil's parents or when it is necessary for carrying out our legislative obligations. Further information regarding the purposes for which these data would be processed will be provided with the data collection form.

Data Retention Periods

The pupil's educational record will move with the pupil to their next school. Where the School is the last school that the pupil attends the records will be kept until the pupil is 25 years old.

Admissions information will be retained for 6 years.

Information relating to financial transactions will be kept for 7 years.

Data Security

ULT has in place technical and organisational measures that ensure a level of security appropriate to the sensitive nature of the personal data that we process. For further information regarding how we keep personal data secure please refer to our security of personal data policy.

Data Processors

We use third party data processors to provide us with a management information system, accounts software, cloud storage services, apps and software for use in the classroom and to facilitate the secure transfer of data between the school and central office. This use of data processors will only take place if is in compliance with the Data Protection Act 1998 and the General Data Protection Regulation.

Decisions on whether we contract with these third party processors are subject to a robust approval

process and are based on a detailed assessment of the purpose for which the data processing is required, the level and sensitivity of data involved and the arrangements in place to store and handle the data. To be granted access to pupil level data, data processors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

We currently use the following data processors:
Capita (Sims)
Hyperspheric Solutions (2009 – 2018) and Go4Schools
Netmedia (Parents Evening Booking System)
Contact Group (Call Parents and Truancy Call)
Parent Pay
Kerboodle
Hegarty Maths
Show My Homework
Salamander
Dumbstruck (AQA MERiT mock exam analysis tool)
CPOMS
Edurio
University of Brighton
University of Sussex
And other curriculum related software

Sharing Data with Third Parties (other data controllers)

We may share data with the following recipients:

Keeping in touch and supporting the School
We would like to share pupil and parent personal data with both our Parent Teacher Association, our Alumni Association. We will only do so if you have signed the appropriate consent form. Details of how these groups use your personal data are given on the consent form. Consent may be withdrawn at any time by writing to Mrs S Pitts or the school office (office@seahavenacademy.org.uk)

References
We will provide references to any other educational institution that the pupil proposes to attend and to potential employers of past and present pupils.

School Inspections
On request we will share academic records with inspectors from Ofsted.

Department for Education
We are required, by law, to pass some information about our pupils to the Department for Education (DfE). This information will, in turn, then be made available for use by the Local Authority.

DfE may also share pupil level personal data that we supply to them, with third parties. This will only take place where legislation allows it to do so and it is in compliance with the Data Protection Act 1998 and the General Data Protection Regulation.

Decisions on whether DfE releases this personal data to third parties are subject to a robust approval process and are based on a detailed assessment of who is requesting the data, the purpose for which it is required, the level and sensitivity of data requested and the arrangements in place to store and handle the data. To be granted access to pupil level data, requestors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

For more information on how this sharing process works, please visit:
https://www.gov.uk/guidance/national-pupil-database-apply-for-a-data-extract

For information on which third party organisations (and for which project) pupil level data has been provided to, please visit: https://www.gov.uk/government/publications/national-pupil-database-requests-received

If you need more information about how our local authority and/or DfE collect and use your information, please visit:

- our local authority at www.eastsussex.gov.uk; or
- the DfE website at https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

We will not give information about our pupils to any other third parties without your consent unless the law and our policies allow us to do so.

Rights of the Data Subject

Data protection legislation gives individuals certain rights which are detailed below. If you wish to exercise these rights please contact Mrs S Pitts (pittss@seahavenacademy.org.uk)

Right of access to personal data "subject access request"

You have the right to access the personal data that the school holds about you. Requests need to be made in writing. If your child is over the age of 12 they will also need to sign the request. We take the security of personal data seriously so we may ask you for proof of identity to verify that you are entitled to the information requested.

Right to withdraw consent

Where we have obtained your consent to specific processing activities you may withdraw this consent at any time.

Right to rectification

You have the right to have the personal data that we hold about you rectified if it is inaccurate or incomplete. We will respond to such requests within one month.

Right to erasure

You have the right to have personal data erased in certain specific circumstances. If you make such a request we will consider whether the right to erasure applies and give you a full and reasoned response.

Right to restrict processing

In certain circumstances you have the right to request that we restrict the processing of your personal data. If you make such a request we will consider whether the right to restrict processing applies and give you a full and reasoned response.

For further information regarding your rights please refer to our rights of the data subject policy.

If you disagree with a decision that we have taken regarding the processing of your personal data please contact ULT's Company Secretary, Steve Whiffen, on 01832 864538 or company.secretary@unitedlearning.org.uk.

You also have the right to lodge a complaint with the information Commissioners Office on 0303 123 1113 or https://ico.org.uk/for-the-public/ .