



Seahaven Academy

Student and Parent Privacy Notice for Seahaven Academy



Seahaven Academy
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Part of United Learning

Student and Parent Privacy Notice for

Seahaven Academy, a United Learning Trust Academy

1. Introduction

- 1.1 This notice is intended to provide information about how Seahaven Academy (the “**School**”) will use or “process” personal data about individuals including current, past and prospective students (referred to in this notice as “**students**”) and their parents, carers or guardians (referred to in this notice as “**parents**”).

2. Responsibility for Data Protection

- 2.1 The Data Controller for personal information held by the School is United Learning Trust (“**ULT**”). ULT is registered with the Information Commissioner’s Office (the “**ICO**”) with the registration number is **Z7415170**.
- 2.2 The Company Secretary is the Data Protection Officer (the “**DPO**”) and is responsible for ensuring that ULT complies with relevant Data Protection laws. They can be contacted on company.secretary@unitedlearning.org.uk or 01832 864538.
- 2.3 Will Taylor (Business Manager and DPL) is responsible for ensuring that the School complies with ULT’s policies and procedures in relation to relevant Data Protection laws. They can be contacted at taylorw@seahavenacademy.org.uk

3. Why the School Collects and Uses Personal Data about Students and Parents

- 3.1 The School and ULT collect, create and hold personal information relating to our students and may also receive information about them from their previous school, local authority and/or the Department for Education (the “**DfE**”). The School also collects and holds personal information about our students’ parents.
- 3.2 The School uses this personal data to:
- provide education services (including SEN), career services and extra-curricular activities to students
 - monitor students’ progress and educational needs
 - to safeguard students’ welfare and provide appropriate pastoral (and where necessary, medical) care
 - to enable students to take part in national or other assessments, and to publish the results of public examinations or other achievements of students at the School
 - to maintain relationships with alumni and the wider School community
 - for the purposes of management planning and forecasting, research and statistical analysis and to enable ULT to monitor the School’s performance
 - to monitor use of the School’s ICT systems in accordance with the School’s relevant Acceptable Use Agreements
 - to receive information about current and prospective students from any

educational institution that they attended.

- to confirm the identity of prospective student and their parents
- to make use of images of students in print and digital communications, and for promotion and marketing, in accordance with the School's Taking, Storing and Using Images of Children Policy
- 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 relevant legal obligations
- to receive reports from any organisation that may be working with a student
- where otherwise reasonably necessary for the School's purposes including to obtain appropriate professional advice and insurance for the School
- to keep parents and the wider School community updated about the activities of the School including by sending updates and newsletters by email and post and on social media
- to organise trips and visits both in the UK and abroad

4. The Categories of Personal Data that the School Processes

4.1 The types of personal data processed by the School include:

- names, addresses, telephone numbers, email addresses and other contact details
- academic records and national curriculum assessment results, including examination scripts and marks
- personal characteristics such as age, gender, ethnic group, religious beliefs, any special educational needs that a student may have and any relevant medical information
- any health information including allergies and medical needs and / or disabilities
- attendance information, behavioural records, any exclusion information
- information provided by previous educational establishments and or other professionals or organisations working with students
- where students go after they leave the School in terms of further education
- for students enrolling for post-14 qualifications, the Learning Records Service will give the School the unique learner number (the “**ULN**”) of a student and may also give the School details about the student's learning or qualifications
- images captured by the School's CCTV system in accordance with the School's CCTV Policy
- still and moving images in accordance with the School's Taking, Storing and Using Images of Children Policy

5. The Legal Basis for the Processing of Student and Parent Data

- 5.1 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.
- 5.2 Information relating to racial or ethnic origin, religious beliefs or health will only be processed with the explicit consent of the student or the student'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 relevant Data Collection Form.

6. Data Retention Periods

- 6.1 The student's educational record will move with the student to their next school. Where this school is the last school that the student attends the records will be kept until the student is **twenty-five years old**.
- 6.2 Admissions information will be retained for **one year** post successful admission or closure of appeal.
- 6.3 Information relating to financial transactions will be kept for **seven years**.
- 6.4 For further information on how long the School keeps personal data for, please refer to our records retention schedule which can be obtained by contacting the School office or the School DPL.

7. Data Security

- 7.1 ULT has in place technical and organisational measures that ensure a level of security appropriate to the sensitive nature of the personal data that the School processes. For further information regarding how the School keeps personal data secure please refer to ULT's relevant data protection and data security policies and procedures.

8. Data Processors

- 8.1 The School and / or ULT use third party data processors to provide a variety of services¹. This use of data processors will only take place if it is in compliance with the *UK GDPR* and the *Data Protection Act 2018* (and any subsequent legislation related to data protection in applicable jurisdictions).
- 8.2 Decisions on whether we (i.e. the School and / or ULT as may be appropriate) contract with these third-party processors are subject to a robust approval

¹ for example, but not limited to, management information systems, accounts software, cloud storage services, applications and software for use in the classroom and to facilitate the secure transfer of data between the School and ULT central office

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 student 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.

8.3 The School currently use the following data processors:

Educational Data Processors	Administrative Data Processors
4Matrix	123 Websites
Boxall	A Star Attendance
Exact	Access-IT
Exam Pro	Adobe Pro
Focus on Sound	Arbor
GL Assessment	BeOnline
GL Assessment	Boxxe
Language Nut	Canva
LASS	Civica
Lexia	Cloud Box
Lexonik	Companion
Lightburn	CPOMS
NGST and NGRT	East Sussex County Council
PASS	Edukey
Pearson	Edval Timetabler
Rapid	Energy Sparx
Satchel	Exact
Science Focus	FFT Education / FFT Aspire
Seneca	GovHub
Soundtrap	IRMS
Sparx	iTrent
TinkerCAD	LabLogger
Twinkl	Microsoft
Unifrog	Parago
	ParentPay
	Pebble

Robin AI
Salamander
SAMS
School Analytics
School Cloud
SchoolHire
Smartgrade
Smoothwall
Steplab
The Key
University of Brighton
University of Sussex
Volan
Wonde

and this list also is to include any other curriculum / educational and / or administrative related software that are used from time-to-time at the School.

9. Sharing Data with Third Parties (other data controllers)

9.1 The School may share data with the following recipients:

9.1.1 Keeping in Touch and Supporting the School

The School would like to share student and parent personal data with both our Parent Teacher Association and our Alumni Association (as and when they may be operational at any time).

The School 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 office@seahavenacademy.org.uk

9.1.2 Careers Guidance

The School shares student data and information to careers guidance services and the national careers service. The service is currently provided by East Sussex County Council.

9.1.3 References

The School will provide references to any other educational institution that the student proposes to attend and to potential employers of past and present students.

9.1.4 School Inspections

Upon receipt of a valid request, the School will share academic records with inspectors from Ofsted.

9.1.5 Department for Education

We are required, by law, to pass some information about our students to the DfE. This information will, in turn, may then be made available for use by the Local Authority.

The DfE may also share student 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 UK *GDPR* and the *Data Protection Act 2018* (and any subsequent legislation related to data protection in applicable jurisdictions).

Decisions on whether the DfE releases this student 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
- the arrangements in place to store and handle the data

To be granted access to student personal data, requestors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention, use and deletion of that personal 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) student personal 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 the School's local authority and / or the 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>

The School will not give information about our students to any other third parties without their consent unless the law and our policies allow us to do so.

10. Rights of the Data Subject

- 10.1 Data protection legislation gives individuals certain rights which are detailed below. If you wish to exercise these rights please contact the School's Business Manager/DPL or the School's Exams and Data Officer.

10.1.1 Right of Access to Personal Data "Subject Access Request"

Every student has the right to access the personal data that the Schools holds about them.

Requests may be made in writing or orally (if requested orally the School will make a record of that request to ensure it is met within the required timescale). Parents also have the right to request the personal data held about their child (if the child is over the age of 12 then they will need to decide whether to consent to the request).

The School takes the security of personal data seriously so may ask the requester for proof of identity to verify that they are entitled to the information and data requested pursuant to the SAR made.

10.1.2 Right to Withdraw Consent

Where the School has obtained a student's consent to specific processing activities then the student may withdraw this consent at any time in writing.

10.1.3 Right to Rectification

A student has the right to have the personal data that the School holds about them rectified if it is inaccurate or incomplete. The School will respond to such requests, to be made in writing, within one month.

10.1.4 Right to Erasure

A student has the right to have their personal data erased in certain specific circumstances. If a student makes such a request, then the School will consider whether the right to erasure applies and give the student a full and reasoned response.

10.1.5 Right to Restrict Processing

In certain circumstances, a student has the right to request that the School restricts the processing of their personal data (e.g. not providing photo consent). If the student makes such a request the School will consider whether the right to restrict processing applies and give the student a full and reasoned response.

10.1.6 Further Information

For further information regarding applicable rights please refer to the United Learning [Rights of the Data Subject Policy](#).

If there is a disagreement with a decision that the School has taken regarding the processing of personal data then please contact ULT's Company Secretary (Alison Hussain) on:

Telephone: 01832 864538

Email: company.secretary@unitedlearning.org.uk.

There is also the right to lodge a complaint with the [Information Commissioners Office](#).