

PRIVACY NOTICE - ALUMNI

Document Owner: Data Protection Officer

Date: September 2024

Status: Statutory



To ensure you are always referencing the most current version, where possible **do not** download a copy of this document. If a paper copy is required please print and destroy as soon as possible. **DO NOT** save a copy to your own device/desktop.

VERSION CONTROL

Version No:	Type of change	Date	Revisions from previous version
1.0	Annual review	Sept 2021	Minimal changes only terminology around UK GDPR.
1.1	Annual review	Jan 2023	No changes
1.2	Interim Review	Mar 2023	Contact details for DPO updated
1.3	Amendment	May 2023	Changed to bi-annual review frequency
1.4	Bi-annual review	Sept 2024	Date changes only

TABLE OF CONTENTS

VERSION CONTROL	1
TABLE OF CONTENTS	2
1. POLICY STATEMENT	3
2. PROCESS FOR COMPLIANCE AND IMPLEMENTATION	3
2.1 The Personal Data We Hold	3
2.2 Why We Use This Data	3
2.3 Use Of Your Personal Data In Automated Decision Making And Profiling	3
2.4 Our Lawful Business For Using This Data	4
2.5 Our Basis For Using Special Category Data	4
2.6 Collecting This Data	4
2.7 How We Store This Data	4
2.8 Who We Share Data With	5
2.9 Transferring Data Internationally	5
3. RESPONSIBILITIES	5
3.1 How To Access Personal Information We Hold About You	5
3.2 Your Other Rights Over Your Data	5
4. HOW TO COMPLAIN	5
5. CONTACT US	6

1. POLICY STATEMENT

- a. Under UK data protection law, you have a right to be informed about how the Academy and City Learning Trust (CLT) uses any personal information that we hold about you once you have left the Academy. We comply with this right by providing you with an 'Alumni Privacy Notice'.
- b. This privacy notice explains how we collect, store and use personal data about alumni of the Academy.
- c. We, The City Learning Trust (CLT) High Lane, Burslem, Stoke on Trent, is the 'data controller' for the purposes of UK data protection law.
- d. Our Data Protection Officer is Nathan Legg (see 'Contact us' below).
- e. The Headteacher/Principal of the Academy acts as the representative of the data controller in their Academy, on a day-to-day basis.

2. PROCESS FOR COMPLIANCE AND IMPLEMENTATION

2.1 The Personal Data We Hold

- a. Personal data that we may hold, collect, use, store and share (where appropriate) about you includes, but is not restricted to:
 - i. Name
 - ii. Your contact details (including address, telephone number)
 - iii. Parents'/carers' address and telephone numbers)
 - iv. Your school email address
 - v. Your test/exam results/school reports
 - vi. Details of any additional support you may have received in school, for example special educational needs.
 - vii. Details of any behaviour issues or exclusions from school
 - viii. Records of your school attendance
 - ix. Photographs taken in school
 - x. Videos recorded in school
 - xi. CCTV images that are captured in school
 - xii. Dietary information (if you have any specific foods you can or cannot eat)
 - xiii. Unique Pupil Number (an identification number that is given to you whilst you were at school)
 - xiv. Date of Birth
 - xv. Safeguarding information (information to keep students safe if they are in danger of being harmed).
 - xvi. Detail of other schools that you have attended.
 - xvii. Detail of any accidents you have had in school
 - xviii. Immigration details (information which says that you can live in this country)
- b. We may also collect, store and use information about you that falls into 'special categories' of more sensitive personal data.
- c. This includes, where applicable, information about:
 - i. Race, ethnicity, religious beliefs,
 - ii. Health, including any medical conditions, and sickness/attendance records
- d. We may also hold data about you that we have received from other organisations, including other schools, local authorities and the Department for Education.

2.2 Why We Use This Data

- a. We use this data listed above to:
 - i. Get in touch with you and your parents/carers if and when we need to
 - ii. Help us to build a community around the Academy
 - iii. Offer enrichment and career development opportunities to current students
 - iv. Notify you of alumni events you may be interested in
 - v. Keep you up to date with Academy news
 - vi. Help us to promote the Academy
 - vii. Keep you safe and comfortable while attending alumni events

2.3 Use Of Your Personal Data In Automated Decision Making And Profiling

- a. 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.

2.4 Our Lawful Business For Using This Data

- a. We will only collect and use your personal information when the law allows us to. Most often, we will use your information where:
 - i. We need to comply with the law
 - ii. We need to use it to carry out a task in the public interest (in order to help facilitate your further education)
- b. Sometimes, we may also use your personal information where:
 - i. You have given us permission to use it in a certain way, for example, provide a reference to college or a prospective employer
 - ii. We need to protect your interests (or someone else's interest)
- c. Some of the reasons listed above for collecting and using your information overlap and there may be several grounds which mean we can use your data.
- d. Where we have got consent to use your data, you may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing consent.

2.5 Our Basis For Using Special Category Data

- a. 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:
 - i. Have obtained your explicit consent to use your personal data in a certain way
 - ii. Need to perform/exercise an obligation/right in relation to employment, social security or social protection law
 - iii. 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
 - iv. The data concerned has already been made manifestly public by you
 - v. Need to process it for the establishment, exercise or defence of legal claims
 - vi. Need to process it for reasons of substantial public interest as defined in legislation
 - vii. 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
 - viii. 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
 - ix. Need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest
- b. For criminal offence data, we will only collect and use it when we have both a lawful basis and a condition for processing as set out in data protection law. Conditions include:
 - i. Have obtained your consent to use it in a specific way
 - ii. 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
 - iii. The data concerned has already been made manifestly public by you
 - iv. 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
 - v. Need to process it for reasons of substantial public interest as defined in legislation

2.6 Collecting This Data

- a. While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.
- b. 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.
- c. Most of the data we hold about you will come from you, but we may also hold data about you from:
 - i. Local authorities
 - ii. Government departments or agencies
 - iii. Police forces, courts, tribunals

2.7 How We Store This Data

- a. We will keep information about you after you have left the Academy, where we are required to by law.
- b. We have a Records Management Policy which sets out how long we must keep information about students. You can obtain a copy of the Records Management Policy from our website or by contacting the Academy.
- c. We have put in place appropriate security measures to prevent your personal information being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
- d. We will dispose of your personal data securely in line with our Records Management Policy.

2.8 Who We Share Data With

- a. We do not share personal information about you with anyone outside the Academy and the City Learning Trust without permission from you, unless the law and our policies allow us to do so.
- b. Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:
 - i. Our local authority – because the law says we have to share certain information, such as safeguarding concerns
 - ii. The Department for Education because the law says we have to share certain information
 - iii. City Learning Trust member schools: Haywood Academy, Mill Hill Primary Academy, Smallthorne Primary Academy and Trentham Academy. This is to allow for the collaboration of teaching and learning across the Trust.
 - iv. Your parents/carers - to communicate as necessary
 - v. Examining bodies – for the purpose of tests and examinations
 - vi. Ofsted - because the law says we have to share certain information.
 - vii. Suppliers and service providers – to enable them to give to us the service we have asked them for
 - viii. Security organisations - to help us to keep you safe whilst on site
 - ix. Health authorities and social welfare organisations - so that we can keep you safe and healthy
 - x. Professional people including consultants who give us advice to help to keep you safe and healthy - the law says we have to do this
 - xi. Police forces and courts - because the law says we have to do this

2.9 Transferring Data Internationally

- a. Where we share data with an organisation that is based outside the European Economic Area, we will protect your data by following UK data protection law.

3. RESPONSIBILITIES

3.1 How To Access Personal Information We Hold About You

- a. You can find out if we hold any personal information about you, and how we use it, by making a 'subject access request' (subject to any exemptions that may apply):
- b. If we do hold information about you, we will:
 - i. Give you a description of it
 - ii. Tell you why we are holding and using it, and how long we will keep it for
 - iii. Explain where we got it from, if not from you or your parents/carers
 - iv. Tell you who it has been, or will be, shared with
 - v. Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
 - vi. Give you a copy of the information in an intelligible form
- c. You may also ask us to send your personal information to another organisation electronically in certain circumstances.
- d. If you want to make a request please contact our Data Protection Officer.

3.2 Your Other Rights Over Your Data

- a. You have other rights over how your personal data is used and kept safe, including the right to:
 - i. Say that you don't want it to be used if this would cause, or is causing, harm or distress.
 - ii. Stop it being used to send you marketing materials
 - iii. Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
 - iv. Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it
 - v. In certain circumstances, be notified of a data breach

4. HOW TO COMPLAIN

- a. We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong.
- b. You can make a complaint at any time by contacting our Data Protection Officer.

c. You can also complain to the Information Commissioner's Office in one of the following ways:

i. Report a concern online at <https://ico.org.uk/concerns/>

ii. Call 0303 123 1113

iii. Or write to:

Information Commissioner's Office

Wycliffe House

Water Lane,

Wilmslow Cheshire SK9 5AF

5. CONTACT US

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

Nathan Legg

City Learning Trust

High Lane

Burslem

Stoke on Trent

ST6 7AB

Email: dataprotection@citylearningtrust.org