



## Model Privacy Notice

**Adopted By:** Board of Trustees

**Date:** January 2025

**Review Date:** June 2026

## Privacy Notice

Date of Issue:	January 2025
Policy applies to:	<b>All staff and stakeholders in the Wessex Multi-Academy Trust.</b>
Policy Version Number:	4
Purpose of the document:	To provide guidance on how Wessex MAT hold and process data, the rights of the data subject, our obligations when obtaining, handling, processing or storing personal data for and on behalf of the Wessex MAT.
Summary of the main points:	The document provides guidance as to collection, handling and processing of personal data, individuals rights under data protection legislation, data sharing and storage and retention of personal data.
Approved by:	This policy has been approved by the Wessex MAT Board of Trustees
Reviewer:	Data Protection Officer
Summary of amendments:	The following sections were updated: 1.3, 4.1, 5.1, 5.4, 10.1, 13.1, 15.1
Next review due:	January 2026

## **1.0 Overview**

We are Wessex Multi-Academy Trust (the Trust, "we"). We are the data controller for the personal data we process under this privacy policy. This means that we have responsibility for how the Schools and Trust Team manage the purpose and means of the processing of personal data. This privacy policy applies to all schools within our Trust. A full list of the Trust schools can be found on our website- [www.wessex.ac](http://www.wessex.ac). Where we use the phrase "we" this refers to the Trust and the individual schools.

- 1.1** The Trust need to gather and use information or 'data' as part of our business and to manage our relationship with you. We intend to comply with our legal obligations under the Data Protection Act 2018 (the '2018 Act') and the UK General Data Protection Regulation ('UK GDPR') in respect of data privacy and security.
- 1.2** Your privacy is important to us. This privacy notice explains the personal data we, and the schools within our Trust may process, how we process it and for what purpose.
- 1.3** Each school will be responsible for the day to day management of data that is held about pupils, staff, parents, carers and other individuals in connection with that school.

## **2.0 About your data**

- 2.1** The Trust will hold and use ("process") personal data about individuals including: its current, former and prospective staff; its current, past and prospective pupils; their parents, carers or guardians (referred to in this document as "parents"); governors; volunteers, interns, suppliers of goods and services to the Trust; and any other members of the Trust community.
- 2.2** This policy applies to all personal data whether it is stored electronically, on paper or on other materials.
- 2.3** This Privacy policy explains your rights as a data subject to understand how your data is used. All members of the Trust community are encouraged to read this Privacy Policy and understand the Trust's obligations to those whose personal data is shared with us.
- 2.4** This Privacy Policy applies alongside any other information we may provide about a particular use of personal data, for example when collecting data whether online, via an online platform or in paper form.

## **3.0 Who we share data with**

**3.1** We share information with a range of organisations, companies and agencies, where it is necessary for us to carry out our legal responsibilities and duties as a Trust. We only share information about you where it is necessary for us to do so, and the law and our policies allow us to do this. The following are examples of who we may share information with:

- **Department for Education (DfE)** -We have a legal requirement to share certain information about our pupils, employees and governors to the DfE
- **Our local authority – school admission and safeguarding teams** -We have a legal requirement to share certain information about our pupils, parents, employees and governors with our local authority.
- **Educational psychologists, school nurses and health professionals-** We sometimes share information about our pupils with other professionals, to help them receive the necessary educational and pastoral support they need. This is usually shared with the parent's consent (and if appropriate pupil's consent) unless it is necessary for us to carry out our official duties or where the data is processed for the purposes of safeguarding the welfare of the child.
- **Other schools when a pupil leaves us** -We are required to transfer our pupils' educational file to their next school when they leave us.
- **Standards and Testing Agency (SATs)** -We are required to share information about pupils in year 2 and in year 6 to the Standards and Testing Agency, so they can facilitate and report on our key stage 1 and key stage 2 national curriculum tests (commonly referred to as SATs).
- **Examination boards and moderators-**We are required to share information about our secondary pupils with examination boards and moderators, so they can enter those pupils into exams, mark their work and issue their grades.
- **Ofsted-**We may be required to support an Ofsted inspection, where an inspector asks to see a sample of the school's records. These records could identify a pupil, employee or visitor. Any personal information the inspector may see, will not be taken away or used in their reports.
- **Youth support services and careers advisors-**We are required to share certain information about our pupils aged 13-19 with our local authority and / or a provider of youth support services, so they can provide further education, advice and training to the pupil.
- **Police and law enforcement agencies-**We may be required to share information about any person we hold information about, to the police or other law enforcement agencies, to assist them in an investigation or to prevent or detect a crime or safeguard individuals at risk
- **Schools within our Trust-** We may sometimes be required to share information about our pupils or employees within our Multi-Academy Trust (MAT), so we can monitor and assess the quality and consistency of our services across the MAT; share resources or to provide particular educational support to individual pupils. We will only share identifiable pupil or employee information, where this is strictly necessary to enable us to carry out our official duties as a Trust.

- **Education settings outside our Trust-** we may sometimes be required to share information about our pupils to colleges and universities so they can provide further education, advice and training to the pupil.
- **Service providers-** We use companies that provide us with a service to help us run effectively as a Trust; the services we often receive are IT support, professional or legal advice, learning or teaching resources, communication services, catering or transport. To receive these services, we sometimes need to share personal information.
- **Alumni groups-** We may share data with alumni groups such as the Hardyans Club where the pupils have given their consent for their data to be used.

**3.2** We also work alongside other organisations or individuals that provide services directly to our parents or pupils, such as the school photographer, organisers of extra-curricular clubs or activities or companies that run school trips or provide accommodation or transport. The companies/individuals we use in these circumstances, may change on a regular basis. If you would like information about any specific companies or individuals we work alongside, please contact us at .....(school to insert their contact details

**3.3** This Privacy Policy applies in addition to other relevant terms, conditions and policies which include but are not limited to:

- any contract between the Trust and its staff or the parents of pupils;
- the Trust's policy on taking, storing and using images of children;
- the Trust's CCTV (where used);
- the Trust's retention of records policy;
- the Trust's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the Trust's IT policies

**3.4** Anyone who works for, or acts on behalf of, the Trust (including but not limited to, staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Policy and all relevant Trust policies.

#### **4.0 Why the Trust needs to process personal data**

**4.1** The lawful bases for data processing as set out in data protection law include the following:

Consent- consent obtained from the data subject or their parent

Contract- Performance of a contract where the data subject is a party

Legal obligation- Compliance with a legal obligation

Vital interest- To protect vital interests of the data subject or other associated person

Public Task- To carry out the processing that is in the public interest and/or official authority

Legitimate interest- It is necessary for the legitimate interests of the data controller or third party in accordance with national law.

- 4.2** We will always seek to process data only when necessary and we will be proportionate in our processing to achieve a purpose.
- 4.3** In order to carry out our ordinary duties to members of the Trust Community (including staff, pupils, former pupils and parents) we may process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of our daily operation.

## **5.0 Consent**

- 5.1** Consent can be withdrawn, subject to contractual, statutory or regulatory constraints. Where more than one person has the ability to provide or withdraw consent the school / Trust will consider each situation on the merits and within the principles of UK GDPR and also child welfare, protection and safeguarding principles. Please be aware that even where you have given consent to the Trust may have another lawful reason to process the personal data in question even without your consent.
- 5.2** That reason will usually have been asserted under this Privacy Policy or may otherwise exist under some form of contract or agreement with the individual.

### **Legitimate interests** - include but are not limited to;

- For the purposes of pupil admissions – to confirm the identity of prospective pupils and their parents);
- To provide education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and the wider Trust community, including marketing or fundraising activity;
- To enable relevant authorities to monitor the Trust's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective pupils, including, to/from any educational institution that the pupil attended or w To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the Trust;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the Trust's IT and communications systems in accordance with the Trust's IT: acceptable use policy;
- To make use of photographic images of pupils, staff and parents in school publications, on the schools /Trust website and (where appropriate) on the Trust's social media channels in accordance with the Trust's policy on taking, storing and using images of individuals;
- To enable payments to be made where appropriate to individual service providers.

- For security purposes, including CCTV in accordance with the Trust's CCTV policy; and
- Where otherwise reasonably necessary for the Trust's purposes, including to obtain appropriate professional advice and insurance for the Trust;

**5.3** Other uses of personal data will be made in accordance with our legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

**5.4** In addition, we may need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on us by law, including as regards safeguarding and employment. Special category personal data are processed on the grounds of;

- explicit consent from the data subject or about their child
- necessary to comply with employment rights or obligations
- protection of the vital interests of the data subject or associated person
- being necessary to comply with the legitimate activities of the school
- existing personal data that has been made public by the data subject and is no longer confidential
- bringing or defending legal claims
- safeguarding
- national laws in terms of processing genetic, biometric or health data.

**5.5** Examples of where special category personal data may be processed include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so: for example for medical advice, social services, insurance purposes or to organisers of school trips;
- To provide educational services in the context of any special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;
- In connection with employment of its staff and volunteers, for example DBS checks, welfare or pension plans;
- To provide suitable food and drink at School or an event while being respectful of religious, cultural and or medical requirements, including allergies.
- To run any of its systems that operate on biometric data, such as for security and other forms of pupil identification (lockers, lunch etc.); or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with our legal obligations and duties of care.

## **6.0 Types of personal data we process**

### **6.1** This may include but is not limited to:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- past, present and prospective pupils' academic, disciplinary, admissions, assessment and attendance records (including information about any special needs), and examination scripts and marks;
- here it is proposed they attend
- where appropriate, information about individuals' health, and contact details for their next of kin;
- references given or received by the Trust about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils; and
- images of pupils, staff and parents (and occasionally other individuals) engaging in school activities, and images captured by the Trust's CCTV system (in accordance with the Trust's policy on taking, storing and using images);

## **7.0 Where we collect information about you**

### **7.1** Most of the personal data we process is provided to us directly by you for one of the following reasons:

- You are a pupil
- You are a parent/carer registering your child at one of our schools
- You are a visitor attending one of our schools
- You are a volunteer, intern, governor or trustee applying to work with us
- You have applied for a job or secondment at the Trust
- You have made an information request, complaint or enquiry to us
- You are a visitor to our website.
- When you give permission to other organisations to share or it is available publicly

### **7.2** We may also receive personal information about you indirectly, for example:

- If you are a pupil, your previous school will send us your education file when you join one of our schools
- A parent/carer may give us your name and contact details in case we cannot contact them directly, or to make us aware that you are authorised to collect their child from school
- An employee may give us your name and contact details as their 'emergency contact' or next of kin
- Your name and contact details may be given to us by job applicants, volunteers, interns or trustees, as a referee to support their application

- Public authorities, regulators or law enforcement bodies may give us information to assist them in their enquiries or to help safeguard children.

**7.3** We may receive and record information from organisations such as UCAS or individual universities that we use to better understand our former pupils' university choices and to inform careers and university advice given to current pupils.

**7.4** The information we get from other organisations may depend on your privacy settings on these sites or the responses you give, so you should regularly check them.

**7.5** The collection of personal data is essential for the Trust's operational use. Whilst the majority of the information provided to us is mandatory, some of it is requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of data collection, whether you are required to provide certain information to us or if you have a choice in this and we will tell you what you need to do if you do not want to share this with us.

## **8.0 Social Media**

**8.1** Depending on your settings or the privacy policies for social media and messaging services like Facebook, Instagram, WhatsApp or X (Twitter), you might give us permission to access information from those accounts or services. By joining an official Trust page or group in social media, you consent to allowing us to contact you through that platform.

## **9.0 When we collect it as you use our websites**

**9.1** When you visit our website, we collect standard internet log information and details about visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of our website. We collect this information in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting this website and will not associate any data gathered, with any personally identifying information from any source.

**9.2** Like most websites, we use "cookies" to help us make our sites – and the way you use them – better. Cookies mean that a website will remember you. They are small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

**9.3** In addition, the type of device you are using to access our website and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you are using, what your device settings are, and why a crash has happened. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

## **10.0 CCTV**

- 10.1** Some parts of our school's campus may be monitored by CCTV. Where any school campus has installed CCTV, the use of CCTV and data processing will be undertaken in accordance with our CCTV policy. These areas are clearly marked by suitable signage. We use any video and audio recorded by CCTV to;
- Detection and prevention of crime in the schools or on our premises
  - School staff disciplinary processes and appeals
  - Student behaviour management, discipline and exclusion management processes
  - Maintaining a safe environment for the whole school community.

We retain this information for a period of up to three months. Access to CCTV footage is controlled. CCTV footage may be passed onto the Police or other relevant authorities.

## **11.0 Who helps us process your data**

- 11.1** Occasionally, we will need to share personal information relating to our community with third parties, such as:
- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
  - health and social care professionals
  - government authorities (e.g. DfE, police or the local authority)
- 11.2** For the most part, personal data collected by the Trust will remain within the Trust, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:
- medical records held and accessed only by the Trust and appropriate medical staff under supervision, or otherwise in accordance with express consent; and
  - pastoral or safeguarding files.
- 11.3** However, a certain amount of any Special Educational Needs (SEN) pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.
- 11.4** Staff, pupils and parents are reminded that the Trust, and all the schools in the Trust, are under duties imposed by law and statutory guidance to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the Local Authority Designated Officer -LADO or police. For further information about this, please request a copy of the Trust's Safeguarding Policy from [.....\(school to insert their contact details\)](#).

- 11.5** Safeguarding records are kept for the welfare of the child and will not be shared.
- 11.6** In accordance with Data Protection Law, some of the Trust's processing activity is carried out on its behalf by third parties, such as IT systems providers, web developers or cloud storage providers. This is subject to contractual assurances that personal data will be kept securely and only processed in accordance with our specific directions.

## **12.0 How we store your data**

- 12.1** The personal information we collect and store is essential for our Trust's operational use. We only keep personal information for as long as we need to and in accordance with our data retention guidance, and where it is necessary to comply with any legal, contractual, accounting or reporting obligations. After this period, we delete or securely destroy personally identifiable data.
- 12.2** We store our data in the UK, however some of our service providers may store personal data outside these areas. We have a contract in place with these service providers, which ensures they process our data securely and in line with our data protection laws. To find out which service providers process data outside the UK please contact [admin@wessex.ac](mailto:admin@wessex.ac).
- 12.3** Physical data is stored securely in offices at each school. Access to physical and digitally held data is restricted to appropriate school staff and volunteers.

## **13.0 How long we keep personal data**

- 13.1** We will retain personal data securely and in accordance with our data retention guidance, and for however long it is necessary to keep for a legitimate and lawful reason and in accordance with specific legal requirements.
- 13.2** If you have any specific queries about how our retention policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact [admin@wessex.ac](mailto:admin@wessex.ac). However, please bear in mind that we will often have lawful and necessary reasons to hold on to some personal data even following such request.
- 13.3** A limited and reasonable amount of information may be kept for archiving purposes and even where you have requested we no longer keep in touch with you, we will need to keep a record of that fact in order to fulfil your wishes.

## **14.0 Keeping in touch and supporting the Trust**

- 14.1** The Trust will use the contact details of parents, alumni and other members of the Trust community to keep them updated about the activities of the Trust, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post.

## **15.0 Your Rights**

- 15.1** You have the following rights under the data protection laws:

- Rights of access -Individuals have various rights under Data Protection law to access and understand personal data about them held by the Trust. You have the right to ask us for copies of your personal data. There are some exemptions, which means you may not always receive all the information we process.
- Rights of rectification -You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Right to erasure -You have the right to ask us to erase your personal if there is no longer a need for school / Trust to keep the data..
- Right to restriction of processing -You have the right to ask us to restrict the processing of your information in certain circumstances.
- Right to object to processing -You may request us to limit what is done with your personal data.
- Right to data portability-This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under a contract (or in talks about entering into a contract) and the processing is automated.
- Right to complain -We work to high standards when it comes to processing your personal information. We hope you will always be happy with the way we handle your information, however if we have not met your expectations, please let us know so we can put things right. To do this, please email the school at .....(school to insert their contact details). If you remain dissatisfied, you have the right to complain to the Information Commissioner’s Office (ICO). The ICO’s contact details are available at <https://ico.org.uk/concerns> Further information about your data protection rights, can be found on the Information Commissioner’s Office website at [www.ico.org](http://www.ico.org).

- 15.2** Any individual wishing to access or amend their personal data or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to .....(school to insert their contact details).

## **16.0 Requests that cannot be fulfilled**

- 16.1** You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to legal privilege (for example legal advice given to or sought by the Trust, or documents prepared in connection with a legal action) or information relating to health, social work, safeguarding data, exam scripts and exam marks, confidential references or any regulatory functions relating to the health service and children's services.
- 16.2** We will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Policy. Every request will be considered on its own merits.

## **17.0 Pupils and Subject Access Requests**

- 17.1** Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the Trust, they have sufficient maturity to understand the request they are making. Personal data about a child belongs to the child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request or have given their consent.
- 17.2** Primary Schools/ Middle Schools- Children below the age of 12 are generally not regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils at any of our primary schools or some classes in our middle schools may be granted without the express permission of the pupil. This is not a blanket rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.
- 17.3** Middle Schools/ Secondary Schools- Children aged 12 and above are generally regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils at some of our middle school classes and secondary school may not be granted without the express permission of the pupil. This is not a blanket rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

## **18.0 Responding to Subject Access Requests**

- 18.1** We would ask that where possible requests for information are given in writing (including by email) to a key member of staff such as the pupils teacher, office administrator or Head Teacher. A Subject Access Request may be made to another member of staff where this is not possible. We would ask that in all cases you advise them that you are making a subject access request and

referred to the designated person within the school

- 18.2** If a Subject Access Request is sent to a school email address outside of term time there is no guarantee that this will be received until the staff return to school given that school emails and social media pages are not regularly monitored over the school holidays and all postal mail may be held unopened until term time commences. If you wish to make a Subject Access Request immediately prior to a school holiday or outside of term time we would ask that this is sent to [dpo@wessex.ac](mailto:dpo@wessex.ac).
- 18.3** When responding to requests, we:
- Will contact the individual to confirm the request was made
  - May ask the individual to provide two forms of identification. It is the individual school's responsibility to verify the identity of the requestor before the disclosure of any information
  - Checks will also be carried out regarding proof of relationship to the child
  - May ask the requester to clarify the scope of the request
  - Will wherever possible respond without delay and within one month of receipt of the request- please note as set out above there may be times when the schools may be unable to monitor social media accounts, emails or post.
- 18.4** May tell the individual we will comply within three months of receipt of the request, where a request is complex or numerous. We will inform the individual of this within one month and explain why the extension is necessary. We will provide the information free of charge in most circumstances.
- 18.5** We will not disclose information if it falls under the grounds set out at clause 16.1 or if it:
- Might cause serious harm to the physical or mental health of the pupil or another individual
  - Would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child's best interests
  - Is contained in adoption or parental order records
  - Is given to a court in proceedings concerning the child
  - If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which takes into account administrative costs.
- 18.6** A request will be deemed to be unfounded or excessive if it is repetitive, or asks for further copies of the same information. When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO. Requests may be made on behalf of others, often a solicitor acting on behalf of a client.
- 18.7** We must be satisfied the third party making the request is entitled to act on behalf of the individual. It is the third party's responsibility to provide evidence of

this entitlement. This might be a written authority to make the request or a more general power of attorney.

- 18.8** The UK GDPR and Data Protection Act 2018 allows exemptions as to the provision of some information.
- 18.9** Any information which may cause serious harm to the physical or mental health or emotional condition of the pupil or another will not be disclosed, nor will safeguarding information or any information that would reveal that the child is at risk of abuse, or information relating to court proceedings.
- 18.10** Information may be provided at the school or sent by secure email. We will not send secure information by post or provide to anyone other than the person making the subject access request.

## **19.0 Parental requests**

- 19.1** It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. We may consider whether there are lawful grounds for sharing with or without reference to that pupil.
- 19.2** Parents will in general receive educational and pastoral updates about their children. Where parents are separated, the Trust will in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child.
- 19.3** All information requests from, on behalf of, or concerning pupils, whether made under subject access or simply as an incidental request, will be considered on a case-by-case basis.

## **20.0 Whose rights?**

- 20.1** The rights under Data Protection legislation belong to the individual to whom the data relates. However, the Trust will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils – for example via a form. Parents and pupils should be aware that this is not necessarily the same as the Trust relying on strict consent.
- 20.2** Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – to seek the pupil's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

- 20.3** In general, the Trust will assume that pupil consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare, unless, in the Trust's opinion, there is a good reason to do otherwise.
- 20.4** However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the Trust may be under an obligation to maintain confidentiality unless, in the Trust's opinion, there is a good reason to do otherwise; for example where the Trust believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.
- 20.5** Pupils are required to respect the personal data and privacy of others, and to comply with the Trust's policies and the Trust rules. Staff are under professional duties to do the same covered under the relevant staff policy. Staff are also required to respect the personal data and privacy of others and comply with all School policies.

## **21.0 Data Accuracy and Security**

- 21.1** We will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible.
- 21.2** We really appreciate it if you let us know if your contact details change by contacting us at [admin@wessex.ac](mailto:admin@wessex.ac). You have the right to request that any out-of-date, irrelevant or inaccurate information is erased or corrected (subject to certain exemptions and limitations).
- 21.3** The Trust will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff and governors will be made aware of this notice and their duties under Data Protection Law and will receive relevant training.

## **22.0 Photographs**

- 22.1** We use photographs of pupils, parents, staff, volunteers and other guests at School events for marketing, fundraising and other publicity purposes. We understand there are many valid reasons why you may not wish us to use your photograph or photographs of your children in this way and you are able to opt out of giving your photography permission by contacting [admin@wessex.ac](mailto:admin@wessex.ac) at any time.

## **23.0 Transfers of data**

**23.1** The Trust may transfer personal information outside the UK to international organisations on the basis that that country, territory or organisation is designated as having an adequate level of protection or that the organisation receiving the information has provided adequate safeguards by way of binding corporate rules or standard data protection clauses or of compliance with an approved code of conduct. If we do transfer information outside of the UK, we will make sure that it is protected by using one of these safeguards:

- Put in place a contract with the recipient that means they must protect it to the same standards as the UK GDPR or use other mechanisms and measures to achieve adequate protection. We also may use the Standard Contractual Clauses published by the EU.
- Binding corporate rules. These are internal rules adopted by group companies to allow international transfers of personal data to entities within the same corporate group located in countries which do not provide an adequate level of protection.
- We may transfer data to service providers based in the US who are certified to the UK Extensions of the EU-US Data Privacy Framework. We will check any relevant privacy policies before transferring data under the UK-US Data Bridge.

## **24.0 Specific Information that the Trust may keep**

### **24.1 Accidents and Incidents**

The Trust keeps a record of all accident and “near miss” incidents that occur on site or as part of its activities. This is a legal requirement and helps us to monitor the health and safety of Staff, Pupils, and other visitors. Anyone who sustains an injury while on site or working away on School business, should complete an accident report.

### **24.2 Admissions**

The Trust will obtain information while processing forms for admission concerning your child’s performance at school, including their disciplinary record; school reports and examination results.

### **24.3 Parents and Carers**

As a parent /carer your data will be used for a full range of activities, including notification of events and the sending of SMS text messages, emails, letters and other communications with the Trust may be tracked and stored to ensure that we are better able to tailor our future communications.

### **24.4 Current Pupils**

We hold personal data pertaining to children and use it to: support their teaching and learning; monitor and report on their progress; provide appropriate pastoral care; and assess how well we are doing as a Trust and each individual school. This information includes a pupil’s contact details, national curriculum assessment results, attendance information and personal characteristics such as ethnic group, any special educational needs and relevant medical information. If

enrolling for post 14 qualifications we may be provided with their unique learner number (ULN) by the Learning Records Service and may also obtain from them details of any learning or qualifications undertaken.

#### **24.5 Activities / Trips / Visits**

The Trust collects and shares such information as necessary to facilitate pupil trips and visits both as part of its regular curriculum and as part of its co-curriculum programme. For example, it may be necessary to share medical information with staff taking a trip out of School.

#### **24.6 Display and Storage of Pupils' Work**

As part of the normal operation of the Trust it is necessary to collect, mark, display and distribute pupil's work. For the most part personal information gathered during this process will be purely incidental – for example the name on the top on an essay. Staff must be cautious when arranging for the display or circulation of work that it does not inadvertently share biographical or other personal data.

Grading of work, and the storage of those grades will be collected by staff and shared with other staff as necessary to provide a suitable learning experience for pupils and for monitoring and assessing pupils, staff and our educational programmes. Marks may be shared with external bodies such as Examination Boards.

#### **24.7 Combined Cadet Force**

Pupils who are enrolled in the Combined Cadet Force (CCF) will be asked to submit information to the CCF. This information is not processed by the Trust. For more information about how the CCF process data please visit <https://combinedcadetforce.org.uk/legal-information>

#### **24.8 Duke of Edinburgh's Award**

Pupils who are enrolled in the Duke of Edinburgh Award scheme will be asked to submit information to DofE directly. This information is not processed the Trust. For more information about how the DofE process data please visit <https://www.dofe.org/privacy-policy/>

#### **24.9 Medical Records**

Data relating to the health and medical record of pupils may be collected. This might include medical records, details of any illnesses, allergies or other medical conditions suffered by the pupil.

Medical Records are Special Category Data, and the Trust uses this information in order to safeguard and promote the welfare of its pupils, for example the Trust uses details of any medical conditions so that staff will be able to respond appropriately in the event of a medical emergency. Medical record pertaining to a pupil will be destroyed after the pupil's 25<sup>th</sup> birthday.

#### **24.10 Special Educational Needs (SEN)**

Data relating to any disabilities and or special educational needs of a pupil may be collected. This might include by way of example medical records and or records of SEN assessments. The Trust will collect this information through Teaching Staff and through its SEN team.

SEN Data is Special Category Data. Relevant SEN information will be shared with the Trust where appropriate to ensure that pupils with special educational needs are given the best possible learning, co-curricular and pastoral experience. Relevant information will also be shared externally with appropriate educational bodies for example with an examination or other awarding body. SEN information will also be used to measure the effectiveness of our SEN programme. SEN records pertaining to a pupil will be destroyed after the pupil's 25<sup>th</sup> birthday.

#### **24.11 Email**

By its very nature, all email contains personal data, and the Trust takes a number of steps to secure its email systems. By emailing the School the contents of your email, including your email address will be logged and stored on the Trust's IT systems. Your email address will then be used for future relevant correspondence, unless you request otherwise.

#### **24.12 Food and Drink**

Where necessary we may collect and store meal preferences and information about allergies and other food related medical conditions for use in events both on and off site and for serving meals at School. This information may include special category data about medical conditions and or ethnicity and religious beliefs.

#### **24.13 IT**

Use of our WIFI and other networks is monitored. We may record how many times you use a service, where you use it, at what times you use it, the quantity of data traffic and how long each session lasts as well as which sites you access. This information helps us to build a profile of our users for statistical purposes and to improve how we provide our service to you. IT usage that infringes our acceptable use policy may be shared with the relevant staff and or authorities so that appropriate action can be taken. Most of this data will be aggregated into groups, which means that we will not be able to identify you individually. However to enforce our acceptable use policy we may collect identifying information about you and your devices including IP address, cookies, and or user information.

Our IT systems are backed up offsite, and some of our systems use cloud based storage. Off-site storage of data only happens on secure regulated servers within the UK or EU. Some data is collected using online forms. This data is also

stored securely on the cloud.

#### **24.14 Staff**

We process personal data relating to those we employ to work at, or otherwise engage to work at the Trust and schools within the Trust. This is for employment purposes to assist in the running of the Trust and to fulfil our contractual arrangements, for example enabling individuals to be paid and to enable appropriate background checks to be completed.

This personal data includes identifiers such as names and National Insurance numbers and characteristics such as employment contracts and remuneration details, qualifications and absence information. We will not share information about you with third parties without your consent unless the law requires us to.

In addition, we process personal data relating to individuals applying for roles at the Trust. Information related to unsuccessful applicants is destroyed within 12 months of their application being processed unless their consent has been given to retain the data. For further information Staff should also see the specific Staff Privacy Policy.

#### **24.15 Suppliers of Goods and Services**

Personal data relating to the suppliers of goods and services who are not corporate bodies is processed to enable the recording of transactions and the payment of monies due to the suppliers. This data will include name, address, telephone email and bank account details.

Where the supplier operates on School premises, it may also be necessary to undertake background checks on the supplier and or their employees.

#### **24.16 Training**

The Trust encourages all its staff, students and volunteers to undergo training from time to time. As part of this process it may be necessary to share information such as previous qualifications, driver's licence details or other personal information with training providers and or awarding bodies. Records of such training are stored by the Trust.

#### **24.17 Volunteers**

We are grateful to parents and other friends of the Trust who give of their time to support Trust or school activities. We necessarily require volunteers to provide information including name, contact details, address and date of birth. Where appropriate may require volunteers to supply further information to enable us to carry out suitable background checks.

#### **24.18 Members, Directors and Governors**

A special category of volunteer are Members, Directors and Governors of the Trust. The Directors are the charity's trustees. We process personal data relating to Members, Directors prospective Members and Directors of the Trust as well as the Governors and prospective Governors of each school within the Trust. This

data will be shared with external bodies including the Charity Commission and Companies House.

## **25.0 Contact**

- 25.1** Please contact [admin@wessex.ac](mailto:admin@wessex.ac) for details of our Data Protection Officer (DPO) who is responsible for data protection. If you have any queries about this privacy policy or any matter relating to the handling of your personal data, please contact [admin@wessex.ac](mailto:admin@wessex.ac) who will forward on to our DPO directly. For further information on data protection please see the Information Commissioner's guidance on the ICO Website <https://ico.org.uk/>.
- 25.2** If you believe that we have not complied with this notice or acted otherwise than in accordance with Data Protection Law, please notify the Company Secretary ([admin@wessex.ac](mailto:admin@wessex.ac)). You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO however we would always be grateful for an opportunity to resolve matters directly with you and the ICO recommends that steps are taken to resolve the matter with the Trust before involving them.

## **26.0 Changes to this Notice**

- 26.1** We review and update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated in November 2024.

