



**Aldenham**  
**Foundation**

# **Pupil Privacy Notice**

## **Year 9 to Year 13**

**Reviewed September 2023**  
**by Bursar (KM)**

## **Pupil Privacy Notice Upper – Year 9-13**

The Aldenham Foundation is a “data controller”. This Privacy Notice is aimed to help you understand how and why we collect your personal information and what we do with it. It also explains the decisions you can make about your own information. We are giving you this Privacy Notice because you are mature enough to make decisions about your personal information. If you have any questions about this, please ask your tutor to arrange a meeting with the Bursar.

### **Data Protection Manager**

We have appointed Mr K Mahon, the Bursar as the Foundation’s Data Protection Manager (DPM) to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact the DPM. You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.

### **Data Protection Principles**

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### **What is "personal information"?**

Personal information is that which identifies you as an individual. We hold information about you which includes information such as your name, date of birth and address as well as things like exam results, any medical details and your unique pupil number. We may also record your religion or ethnic group. CCTV, photos and video recordings of you are also personal information as well as vehicle details for those authorised to use our car parks.

### **How and why do we collect and use personal information?**

Our main reason for using your personal information is to provide you with an education. Below are examples of the different ways in which we use it and where it comes from.

- Admissions forms give us lots of personal information. We also get information from you, your parents, your teachers and sometimes other pupils. Your old school also gave us information about you so that we can teach and care for you.
- Where needed, we sometimes we get information from your doctors and other professionals so we can look after you.

We collect this information to help the Foundation run properly, safely and to let others know what we do here. Here are some examples:

- We need to tell the appropriate teachers if you are allergic to something or have a health issue.
- We might need to tell your teachers if you have learning needs or need extra help with some tasks.
- We may need to share information about your health and wellbeing with the Health Centre, Foundation Doctor or counsellor.

- We use CCTV to make sure the Foundation is safe. We do not use CCTV in private areas such as changing rooms.
- We record your attendance and if you have time away from the Foundation, we record the reason(s) why.
- We may need to give some of your information to the Government (e.g. the Department for Education). Another example could be that we may need to tell the local authority that you attend the Foundation or let them know if we have any concerns about your welfare.
- We are legally required to provide the Department for Education with certain information about you and your classmates.
- We may need information about any legal matter which relates to you. This is so we can safeguard your welfare and wellbeing and the other pupils at the Foundation.
- If you are from another country, we have to make sure you have the right to study in the UK.
- We might have to provide information to UK Visas and Immigration who are part of the Government.
- Depending on where you go when you leave us, we may need to provide your information to other schools, colleges and universities or potential employers e.g. we may share information about your exam results and provide references.
- When you take public examinations (e.g. GCSEs) we will need to share information about you with examination boards. For example, if you require extra time in your exams.
- We are sometimes inspected to make sure that we are doing everything that we should to be a good school. We may have to share your information with the inspectors to help them to carry out their job.
- If someone makes a complaint about how the Foundation has behaved, we may need to use your information to deal with this appropriately e.g. if your parents complain that we have not looked after you properly.
- We may need to share information with the police or our legal advisors if something goes wrong or to help with an inquiry.
- Occasionally we may use consultants, experts and other advisors to assist us in fulfilling our obligations and to help us run the Foundation properly. We might need to share your information with them if this is relevant to their work.
- If you have misbehaved in a serious way and the police have become involved, we may need to use information about the action taken by them.
- We may share some information with our insurance company to make sure we have the insurance cover that we need.
- We may share your academic and (where fair) your behaviour records with your parents or education guardian so they can support your schooling.
- We will only share your information with other people and organisations when we have a good reason to do so. In exceptional circumstances, we may need to share it more widely than we would normally.
- We will monitor your use of email, the internet and mobile electronic devices. This monitoring is sometimes carried out using computer software. In certain circumstances we may look at the content of your communications (e.g. emails and text messages). We monitor and look at your use of technology to check that you and your classmates are not misbehaving, at risk of harm or for other good reasons.
- We may take photographs or videos of you at events to use on social media, on our website or in other marketing communications. This helps us show prospective parents and pupils what we provide and to promote the Foundation. We may seek specific consent before using a photograph or video recording of parents and pupils, where we consider that the use is more privacy intrusive. We may continue to use these photographs and videos after you have left.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- We publish our public examination results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing. If you

have concerns about us using photographs or videos of you, please speak to your tutor and ask to arrange a meeting with the Marketing Manager if needed.

- We may keep details of your address when you leave so we can send you OA News (the Old Aldenhamians alumni) and find out how you are getting on. Further information on the OA's can be found on the Foundation website.
- We sometimes use contractors to handle personal information on our behalf for example:
  - IT consultants who might access information about you when checking the security of our IT network.
  - We do use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the Foundation site.

The majority of your Personal Data collected by us will mostly remain within the Foundation and in all cases it will be handled only by people who need to know the information. Again, if you have any concerns about any of the above, just ask us.

### **Sending information to other countries**

We may send your information to countries which do not have the same level of protection for personal information as the UK. For example, we may communicate with you by email when you are overseas (for example, when you are on holiday).

The EU has produced a list of countries which have adequate data protection rules. The list can be found at [https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en). If the country that we are sending your information to is not on the list or, is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then, it might not have the same level of protection for personal information as the UK.

We will provide you with details about the safeguards which we have in place outside of this Privacy Notice. If you have any questions about the safeguards that are in place, please ask your tutor to arrange a meeting with the Bursar.

### **Data Retention**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for. This includes for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity as well as the potential risk of harm from unauthorised use or disclosure, the purposes for which we process it, whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with them, in which case, we may use such information without further notice to you. Once you are no longer a student at the Foundation, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

### **Our legal grounds for using your information**

This section contains legal and technical information about the legal grounds we are relying on when handling your information as described above.

#### Our legitimate interests

This means that we are using your information when this is necessary for our legitimate interests except when this would be unfair to you. We rely on this ground for many of the ways in which it uses your information. Specifically, the Foundation has a legitimate interest in:

- Safeguarding and promoting your welfare and the welfare of other students.
- Providing references for you.
- Telling people about the Foundation and what we do e.g. we may use photographs of you in our prospectus, on our website or in our social media.
- Monitoring the proper use of our IT and communications systems.
- Improving the Foundation e.g. if we want to raise money to build new buildings or to make sure that we are providing you and your classmates with a good schooling experience.

Additionally, your personal information may be processed for the legitimate interests of others. For example, we may use information about you when investigating a complaint made by one of your fellow pupils. If you object to us using your information where we are relying on our legitimate interests as explained above, please let us know.

### Contractual Obligation

The following is an example of when we use your information to comply with our legal obligations:

- Providing you with an education.

### Legal obligation

We might need to use your information in order to comply with a legal obligation e.g. to report a concern about your wellbeing to Children's Services. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

### Vital interests

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else. For example, to prevent you or your fellow pupils from being seriously harmed.

### Performance of a task carried out in the public interest

The following are examples of when we use your information to perform tasks in the public interest:

- Safeguarding and promoting your welfare and the welfare of other children.
- Ensuring that we comply with all of our legal obligations.

If you object to us using your information when we are relying on this ground, please ask your tutor to arrange a meeting with the Bursar.

### Consent

We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information, you can take it back at any time. Any use we have made of your information before you withdraw your consent will still remain valid.

There are some limited circumstances where your request to withdraw consent can't always be accepted. For example, where we have to comply with legal obligations to keep certain data to give to official authorities e.g. Department for Education, County Council. Please let us know if you would like to withdraw any consent that you have given. In some cases, we will rely on more than one of the grounds above for a particular use of your information e.g. we may rely on legitimate interests and public interest grounds when using your information to look after you and your classmates.

## **Special Categories**

The Foundation must also comply with an additional condition where it processes special categories of personal information. These special categories include; personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation.

## **What decisions can you make about your information?**

From May 2018 you will be able to make various decisions about your information. Some of these are new rights whilst others build on existing ones. Your rights are as follows:

- If information is incorrect you can ask us to correct it.
- You can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- You can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- You can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer.
- You can request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent without affecting the lawfulness of our processing based on consent before its withdrawal).
- You can object on ground relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.
- Our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate, we can only use it for limited purposes while we check its accuracy.

Please note that the above rights are not absolute and we may be entitled to refuse requests where exceptions apply. The Foundation will endeavor to respond to any such requests as soon as is reasonably practicable and in any event, within statutory time limits (which is generally 1 month, but actually fulfilling more complex or multiple requests, e.g. those involving third party information may take 1-2 months longer).

## **Further information and guidance**

This Notice is to explain how we look after your personal information. If you have any questions of concerns, just ask your tutor to arrange a meeting with the Bursar. Alternatively, you can ask your parents to speak to us on your behalf if you prefer.

Please ask if you:

- Object to us using your information for marketing purposes e.g. to send you information about school events. We will stop using your information for marketing purposes if you tell us not to.
- Would like us to update the information we hold about you.
- You would prefer that certain information is kept confidential.