# How We Use Your Information
# Privacy Notice for Pupils of Orchard Hill College Academy Trust (Full)

## Orchard Hill College Academy Trust

February 2026

**Pupil privacy notice**

## Introduction

Orchard Hill College Academy Trust is referred to in this key information notice as **the Trust** or **we**. When we say the Trust, we mean all the schools within the Trust that form a part of the Trust. This privacy notice provides information about **how** and **why** we collect your personal data, and what we do with that information. It also explains the decisions that you can make about your personal data. The Trust is responsible for how your personal data is used under data protection law.

In this notice, when we say **parent**, we mean your mum or dad or another trusted adult who looks after you at home and acts for you with your agreement. It also includes anyone who has a legal right to act for you, such as someone with Power of Attorney or someone appointed by a court.

If you have any questions about this notice, please talk to your teacher or your parent who can ask questions on your behalf.

Or you can contact the Data Protection Lead data.protection@ohcat.org,

Or the Data Protection Officer, GDPR Sentry Limited, Unit 434 Birch Park, Thorp Arch Estate, Wetherby, LS23 7FG, support@gdprsentry.com, 0113804203.

## What is "personal data"?

Personal data is information about you.

It includes your name, date of birth and address as well as things like exam results, medical details, information about how well you achieve and any challenges you have. CCTV images, photos and video and audio recordings of you are also your personal data.

## Where we get your personal data from and who we share it with

We get your personal data from different places such as your teachers, parents, your old school(s), other people in the Trust community and outside for example the local authority who give us information that we need to look after you.

Sometimes, we will also share information with these people and organisations, for example, we will tell your parents about how well you are doing at school.

## Why we use your personal data and our lawful bases for doing so

The Trust uses your personal data to:

1. Teach and educate you and other pupils.
2. Look after you and other pupils.
3. Make sure that you and others are following school rules.
4. Make sure that we comply with the law, our other obligations, and to look after the Trust.
5. To tell people about the Trust and what we do for example, we may use photos of you to advertise the Trust on our website or on social media.

We can only use your personal data if we have a good reason this is called having a lawful basis. The lawful basis that we use are as follows:

| Lawful Basis | What it Means | When the Trust Uses It |
|---|---|---|
| Public Task (PT) | We use your personal data because we are carrying out our job. This includes teaching you, supporting you, keeping you safe, and running the Trust properly. | Teaching and learning, safeguarding, behaviour and attendance, IT monitoring, CCTV, sharing information with local authorities, exam boards, regulators, and other education providers. |
| Legal Obligation (LO) | We must use your personal data because the law requires us to. | Safeguarding concerns, health and safety, reporting to the local authority or government, keeping certain records, complying with court orders. |
| Vital Interests (EM) | We use your personal data to protect someone's life in an emergency. This is rare. | Medical emergencies, serious incidents where someone is at immediate risk. |
| Legitimate Interests (LI) | We use your personal data for a reason that helps the Trust or someone else, as long as this does not unfairly affect you. We only use this when Public Task or Legal Obligation do not apply. | Some internal uses of images, contacting you after you leave (non-marketing), managing complaints or disputes, running the Trust efficiently. |
| Consent (C) | You choose whether we can use your personal data for a specific purpose. You can change your mind at any time. | Using your image on the website, social media or prospectus; ending fundraising emails or other direct marketing; any optional activity that is not part of our job as a school. |
| Recognised Legitimate Interests (RLI) | A small number of situations where the law says we can use legitimate interests without extra tests. Because we are a public body, this hardly ever applies to us. | Only in very limited cases, such as certain safety or security situations that fall outside our normal duties. |

## In more detail

Here we give you examples of how and why the Trust uses your personal data, where we get it from, and who it is shared with in more detail.

We use colours to help you see which lawful bases we are using. LI means legitimate interests, PT means public task, LO means lawful obligation and EM means an emergency, RLI means recognised legitimate interest, C means consent. More than one lawful basis may apply depending on the circumstances, for example LO, PT means we are using legal obligation and/or public task for that purpose.

<u>Admissions and when you start at the Trust</u>

1. We use your personal data before you start at the Trust, for example, when making sure that any reasonable adjustments / suitable arrangements are made for you when you visit and learn more about you, additional information may be provided by your parents (LO, PT).

2. The admission and enrolment forms which you or your parents complete give us personal data about you such as, your name, contact details, disabilities, any difficulties you have with work, hobbies and interests, medical information (such as information an allergy) and your family circumstances (LO, PT).

3. Your old school(s) may give us information about how well you did and any difficulties you had so that we can teach and take care of you (LO, PT).

4. We may let your old school know if you have been offered a place with us. This will help your old school to see what happens to their pupils when they leave, which will help them improve for the future. (PT).

<u>During your time at the Trust</u>

5. We get information from you, your parents, your teachers and other pupils.

6. We will share information about you with teachers and other people at the Trust, for example:

   6.1 We may need to tell some of your teachers if you have a health issue and use your medical information to look after you and help us make decisions (LO, PT).

   6.2 We will need to tell your teachers about your special educational or other additional needs and if you need extra help with some things (LO, PT).

   6.3 We may need to share information about you for example, about your health and wellbeing with the Trust nurse and therapy team (LO, PT).

   6.4 We will share information about your allergies so that we can look after you and take it into account when we make decisions (LO, PT, EM).

   6.5 If we have information that you have a disability, we will use the information to make adjustments and to support you (LO, PT).

7. Where appropriate, the Trust will have information about your religious beliefs or other beliefs and practices. For example, if you do not eat certain foods (LO, PT).

8. We will also hold information such as your religion or ethnic group for the purposes of monitoring how well we are meeting our equality and inclusion goals (LO, PT).

9. We will use information about your gender (identity) and sex (biological) to provide support and to help us to meet your needs (LI, LO, PT).

<u>Monitoring and keeping you and others safe</u>

10. We use personal data to make sure the Trust site(s) and buildings are safe, for example, we keep a record of who is on the Trust site(s) at any given time (PT).

11. We record your attendance and if you have time away from the Trust, we record the reason(s) why. We share this information with the local authority and the Department for Education (LO, PT).

12. We use CCTV on our sites to help keep everyone safe. CCTV is only used in public areas and **never** in private spaces such as changing rooms. For more detail, you can read our CCTV Policy on the Trust website.

    We use CCTV to:

    - safeguard pupils, staff and visitors

- protect Trust buildings and property from crime such as theft or vandalism
- help keep people safe on site
- support the investigation of accidents, incidents and health-and-safety concerns
- assist law-enforcement agencies in preventing and detecting crime, and in identifying individuals involved in criminal activity

We use CCTV because we have legal duties to keep people safe and because it is part of our public task as an education provider (LO, PT).

13. When you use school computers (including iPads) or the internet, we can see what websites and apps you have visited. We can also see what is being said in documents, in emails and in other messages that you have sent or received. This helps us make sure you are safe and not looking at anything that could be harmful or upsetting. Your teachers and staff at the Trust do these checks. We also use software that does checks automatically and alerts your teachers and other staff at the Trust (LO, PT).

14. We also have special filters that block certain websites and content. This means some websites won't open at school because we want to protect you from seeing things that are not safe or appropriate (LO, PT).

15. If you would like more information about paragraphs 13 and 14, you can read the acceptable use of IT policy or speak to your teacher (LO, PT).

16. We must make sure that our computer systems are working well and are secure. This may involve information about you, for example, our anti-virus software might scan files containing information about you (PT).

Sharing information about you

17. We share personal data with doctors, nurses and other experts, for example, if we need to do this to look after you or in relation to immunisations (LO, PT).

18. We will need to share some information about you with the government for example, the Department for Education and with regulators. Regulators are responsible for creating rules that the Trust and people must follow. We give lots of examples in the sections below (LO, PT).

19. We will need to provide your personal data to the local authority (e.g. that you attend your school or if you leave. We let them know if we have any concerns about your welfare). The local authority may also share information with us for these reasons (LO, PT).

20. We may need to share information about you with regulators, who are responsible for things such as checking that the Trust is well managed and that it keeps people safe. Here are some examples:

    20.1 The Health and Safety Executive (a government organisation) if there is a health and safety issue (LO, PT).

    20.2 Ofsted who will inspect schools in the Trust to make sure that we are continuing to manage them well. We may have to make your personal data available to the inspectors to help them to carry out their job (LO, PT).

21. We might need to know if there are legal matters involving you or your family, including any special rules from the court, for example, if one of your parents has to collect you from school on certain days. This is so that we can look after you and the other pupils (LO, PT).

22. Depending on where you will go when you leave us, we will provide your personal data to other schools, colleges and universities, UCAS or potential employers. For example, we will share information about your achievements and provide references. Any references that

we provide or receive will be treated as confidential which means that you will not usually be provided with a copy (LO, PT).

23. We may pass on information to your next school or college to help them look after you, for example, information about any concerns we have had about your welfare (LO, PT).

24. 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 (LO, PT). We may share your public exam results with your parents (LO, PT).

25. The Learning Records Service (which is part of the government) will give us your unique learning number. We may receive details about you, e.g. your previous qualifications from the Learning Records Service (PT).

26. We will provide your personal data to the local authority so that they can provide careers advice. We may also share your personal data with the youth support services provider- (PT).

27. If someone makes a complaint about the Trust or a teacher, or if there is a dispute, then we may need to use your personal data to investigate and respond. We might also have to share your personal data with the government and regulators if they become involved (PT, LO).

28. The Trust will share information about your EHCP with the local authority to support you (LO, PT).

29. We may share your personal data with other academies in the Trust. For example, how well you have achieved (LO, PT).

30. We may hire someone from outside of the Trust to provide activities. For example, a teacher who does not normally work for the Trust, or a company that provides outdoor activities. We may share your personal data with them, for example, to tell them about things you are good at and things you may need support with (LO, PT).

31. We will share your personal data with the trustees of the Trust, if it concerns something they should know about or the information will enable them to fulfil their role as a trustee. For example, this will apply if you have done something really well or if there is a problem at the Trust they need to know about (PT).

32. We may need to share information about you with the police (and safeguarding and public-protection agencies) if something has gone wrong or to help with an enquiry. For example, if someone is injured at school, if there is a theft, or someone has misbehaved in a serious way (LO, PT).

33. We may use consultants, experts and other advisors to assist the Trust in fulfilling its obligations and to help run the Trust properly. We will share your personal data with them only if this is relevant to their work (LO, PT).

34. We may share some information with our insurers if there has been an incident or to make sure that we have the insurance that we need (LO, PT).

35. If the Trust is dealing with a request for information, query, or complaint, we may need to share your personal data with the other people involved, such as, other pupils and their parents (LI, PT).

36. We will share information with your parents about how well you are doing, for example, progress in lessons and (where fair) information about incidents that happen at school so they can support you (LO, PT).

37. If you are involved in an incident with another pupil, then we might share information with that pupil and their parents, for example, what arrangements are in place to prevent recurrence (PT, LO).

38. If we ever decide to change how we are run, for example in the event of a transfer of your school to another academy trust, your information would be shared with the incoming academy trust as part of that process (LI, PI).

39. We use others to handle personal data on our behalf for the following purposes:

39.1 An IT service provider who helps run the Trust's computer systems, for example, they might need to access a file containing personal data when investigating a fault, creating an IT account and email for you to use or checking the security of our IT network;

39.2 caterers may have information about any food allergies or intolerances that you have;

39.3 we use software, apps and websites to help us with teaching, and to help us provide pastoral support to you and other pupils. For example, we use an app which allows us to record health & safety incidents, safeguarding concerns, and record attendance and other information about you; and

39.4 we use third party "cloud computing" services to store some information rather than the information being stored on hard drives on the Trust site.

39.5 We use some digital tools that include artificial intelligence (AI) to support functions such as safeguarding alerts, incident monitoring, and administrative efficiency. These tools may process limited personal data about you. All AI tools are used under the Trust's data-protection policies, with human oversight, and we do not use AI to make decisions about you without human involvement.

40. We may share your personal data with anyone who works with the third parties mentioned above, for example, to support our systems, such as email, learning platforms and cloud storage (LO, PT).

41. Anyone that we share information with may give us information about you as well.

<u>Photos, videos and promoting the Trust</u>

When we say **images** we mean photos (still) or videos (moving) images of you.

42. Sometimes we use photos and videos for teaching or other purposes (PT, LI). We may continue to use these photos and videos after you have left.

**Examples of when we may use your image** (PT)

- Images of you used internally to inform staff which pupils have allergies.
- Images of you taken during a lesson which are only shown to the pupils in the class to provide feedback.
- Images of you taken during a lesson which are only shown to the pupils in the class to provide feedback. Images of you to be used internally, for example on our Management Information System or for ID passes.
- Images of you taken for internal assessments. This is only done on an occasional basis for a specific purpose.

- The use of a webcam to broadcast images of you within the Trust, for example, to allow one class to see another as part of an IT lesson or for an online lesson.
- Images of you taken on a school trip or during a sporting event or celebration to be used for an internal exhibition or display.
- Images sent only to the Trust community (e.g. on a display in your school, in an internal newsletter, or on a password protected parental portal).

43. You might have seen that we often publish photos and videos of our pupils. We might put these photos and videos on our website, on our social media pages and in our prospectus. We do this to show people (such as pupils thinking of coming to the Trust) what we do here and to advertise our schools. We won't do this unless you give us you consent.

**Examples of when we will not use your image without asking for your consent (C)**

- Images of you published on a Trust website or in a prospectus.
- Images of you used in social media e.g. on Instagram.
- Images of you published in a local newspaper.
- Images of you used in an advertising campaign. Images of you used in a case study (e.g. in the prospectus).

44. Anytime we would like to use a photo or video in a more unusual or high-profile way, for example, on a banner or billboard we will always speak to you about this first. If you have concerns about us using photos or videos of you, please speak to your teacher.

45. We may use your personal data to help make the Trust better, for example, after you have left the Trust, we might send you information about how you can contribute to a fundraiser (LI, PT, C).

46. We will keep you updated about what is happening at your school and the Trust after you have left. This includes to tell you about events and activities and to find out how you are getting on. We may also with your consent pass your details onto an alumni organisation. (LI, PT, C).

47. We also keep some information forever for archiving purposes and for historical research purposes, for example, we keep some old photos so that we have a record of what the Trust was like in the past as this helps get people interested in the Trust's history. Information held in our archive may be made publicly available, but this would only be done in compliance with data protection laws. (LI, PT).

## Consent

We may sometimes ask for your consent to use your personal data. For example, we may ask for your consent to email you about a fundraising event or to use your image on our website.

If you give us your consent to use your personal data, then you can change your mind at any time. But any use of your personal data before you withdraw your consent remains valid. Please speak to your teacher if you would like to withdraw any consent that you have given.

## Sending information to other countries

When the Trust sends personal data outside of the UK, we have to consider whether your personal data will be kept safe. Some countries are considered by the UK Government to have adequate rules including all of the European Union and some other countries, such as, Argentina, New Zealand, Norway and Switzerland.

The Trust sends your personal data to countries with adequate rules, for example, if we arrange a trip to France and share your personal data with activity providers and the hotel.

In certain circumstances, we may transfer a very limited amount of personal data to countries outside the UK that do not have the same level of data-protection laws. For example, our IT services provider may access limited personal data from South Africa when providing remote technical support. Where this occurs, we use UK GDPR-approved safeguards (such as Standard Contractual Clauses) to ensure that your information remains protected.

If you have any questions about the safeguards that are in place, please contact your form teacher.

## How long do we keep your personal data?

We keep your personal data for as long as we need to in order to teach and look after you. We will keep a lot of information after you have left the Trust, for example, so that we can find out what happened if you make a complaint.

In some cases, we may keep your personal data for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

Please see our information and records retention policy for more detailed information. This can be found on our website.

## What decisions can you make about your personal data?

You can ask us to:

- correct your personal data if you think there is a mistake or if something is missing, for example, if we have the wrong address for you;
- give you a copy of your personal data and certain other information relating to your personal data. This is known as a subject access request;
- delete your personal data, for example, where we no longer need your personal data;
- share your personal data with someone else;
- limit how we use your personal data, for example, whilst we check whether there is a mistake in your personal data;
- object to how we use your personal data where:
    - we are using it for direct marketing purposes for example, to send you an email about a fundraising opportunity;
    - our lawful basis is either legitimate interests or public task. Please see the section "Our lawful bases for using your personal data" above; and
    - if we ever use your personal data for scientific or historical research purposes or statistical purposes.

Your teacher can give you more information about your data protection rights. Please note that these rights do not apply in all cases and we will not always have to comply with your request. For example, if we keep a record because we are worried about you then we will often need to keep this even if you ask us to delete it.

## Further information and guidance

Your teacher can also answer any other questions which you might have.

Like other organisations we need to keep your personal data safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

If you:

- would like to exercise any of your rights listed above; or
- would like us to update the information we hold about you; or
- have any concerns about how your personal data is used or shared.

Please speak to your teacher or another member of staff or email data.protection@ohcat.org.

The Data Protection Officer is in charge of the Trust's data protection compliance. You can ask your teacher to speak to the Data Protection Officer or speak to the Data Protection Officer yourself.

If we ask you to tell us something and you do not then this may make it more difficult for us to teach and look after you and others.

You have the right to make a complaint to us if you are concerned about the way that we manage your personal data. Complaints should be raised by emailing data.protection@ohcat.org.

If you remain dissatisfied after making a complaint, you have the right to complain to the Information Commissioner's Office (ico.org.uk). The ICO is the data protection regulator which means that they enforce the rules that we have to obey.

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