

Privacy Notice – Alumni

Approved by RET Board

Approved on December 2019

SLT contact Headteacher

Revision due Every 2 years



Privacy Notice – GDPR & Data Protection Act 2018

Privacy Notice for alumni

1. Background

This Russell Education Trust ('the Trust') Privacy Notice applies to all personal data held by the Trust as a multi-academy trust and by individual schools in the Trust.

The Trust aims to ensure that all personal data collected by the Trust and in its individual schools, is collected, stored and processed in accordance with the [General Data Protection Regulation \(EU\) 2016/679 \(GDPR\)](#) and the Data Protection Act 2018 (DPA 2018).

Under data protection law, individuals have a right to be informed about how the Trust and its individual schools use any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **alumni of our schools**.

The Russell Education Trust, Manor House, 1 The Crescent, Leatherhead, Surrey, KT22 8 is the 'data controller' for the purposes of data protection law.

Our data protection officer is: Jo Townsend (see 'Contact us' below).

2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Name and date of birth
- Contact details
- Details about your time at your school, including records of your achievements and interests
- Records of contributions you have made to the school since leaving, such as your time, expertise or money
- Records of how you have engaged with our alumni network, including emails you have opened, events attended, mailing lists you have signed up to and any other interactions
- Bank details and other financial information, if you make any payments to the school
- Records associated with Gift Aid claims on donations

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Photographs and videos of your time at school
- Information required to manage your attendance at alumni events, including access arrangements and dietary requirements
- CCTV footage when attending our school sites

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We may also hold data about you that we have received from other organisations, including other schools and colleges.

3. Why we use this data

We use the data listed above to:

- Help us build a community around our schools
- Offer enrichment and career development opportunities to current students
- Raise extra money so that we can continue to improve the experience students get from the school
- Notify you of alumni events you may be interested in
- Keep you up to date with school news
- Help us promote our schools
- Keep you safe and comfortable while attending alumni events
- Tailor the communications we send to you, to ensure they are appropriate and relevant

3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.2 Use of your personal data in automated decision making and profiling

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.

4. Our lawful basis for using this data

We only use your personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation – this means we need to process the data to meet our responsibilities under law such as sharing information with the Department of Education and Local Education Authority.
- We need it to perform an official task in the public interest – this means we need to use your data to fulfil our official duties.
- We have obtained your consent to use it in a certain way - we will obtain your consent to use your personal data in specific circumstances.
- We need to protect your vital interests (or someone else's interests) – this means in a life-or-death situation, such as a medical emergency.

Where you have provided us with your consent to use your personal information, you may take back this consent at any time. We will make this clear when requesting your consent and will explain how you would go about withdrawing your consent.

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4.1 Our basis for using special category data

For 'special category' data (more sensitive personal information), we only collect and use it where 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:

- We have obtained your specific and explicit consent to use your information in a certain way
- We 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
- We need to process if for reasons of substantial public interest as defined in legislation
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to use it for health or social care purposes and it is used by or under the direction of a professional obliged to confidentiality under the law
- We need to process it for archiving or for statistical purposes, and the processing is in the public interest.

Some of the reasons listed above for collecting and using your personal information overlap, and there may be several grounds, which justify our use of this data.

For criminal offence data, we will only collect and use it where the law allows us to do so and in accordance with data protection law.

5. Collecting this data

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

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.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Other schools and colleges
- Police forces, courts, tribunals
- Your family

6. How we store this data

We keep personal information about you while you remain involved in our alumni network. We may also keep it beyond this if this is necessary. Our Data Retention Schedule sets out how long we keep information about alumni. You can locate this on your school website.

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.

We will dispose of your personal data securely when we no longer need it.

Privacy Notice – Alumni

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7. Who we share data with

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- The local authority – to meet our legal obligations to share certain information with it
- Government departments or agencies such as The Department for Education (including the Education Skills Funding Agency and Regional Schools' Commissioner) to meet the requirements under the Trust's Funding Agreement to provide certain information on the educational provision of the Trust.
- Educators and examining bodies – to support the successful education of our students including the proper coordination of their examination entries.
- Our regulator e.g. Ofsted to meet our obligations under the legislative framework for the monitoring and evaluation and assessment of our schools.
- Suppliers and service providers – to enable them to provide the service we have contracted them for.
- Financial organisations such as our schools' electronic payments provider – to meet our schools' financial commitments and to ensure the effective working of its financial systems.
- Central and local government – to meet the requirements under the Trust's Funding Agreement and other data collection requirements such as statistical and financial returns.
- Our internal and external auditors - to meet our legal obligations to have our accounts audited in accordance with legislation.
- Survey and research organisations – to support the collation of data to support the improvement of education across the country.
- Health authorities – to meet our obligations to protect the welfare of our students.
- Security organisations – to ensure that our staff and students are as safe as possible and to meet our obligations and duties under legislation.
- Health and social welfare organisations – to meet our obligations to protect the welfare of our students.
- Professional advisers and consultants – to ensure that can meet the educational and pastoral requirements of our students.
- Police forces, courts, tribunals – to meet our obligations to share certain information in accordance with legislation.
- Other Russell Education Trust schools and the Trust's central team to support the effective management and operation of our schools, for example to facilitate benchmarking exercises.

7.1 Transferring data internationally

Where we transfer your personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

8. Your rights

8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

Privacy Notice – Alumni

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- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

8.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Privacy Notice – Alumni

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10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- **Data Protection Officer:** Jo Townsend
- **Email address:** DPO@Russelleducationtrust.org.uk
- **Address:** Data Protection Officer, Russell Education Trust, Manor House, The Crescent, Leatherhead, Surrey, KT22 8DY. Please mark private and confidential for the attention of the Data Protection Officer.