THE MOUNTBATTEN SCHOOL

Privacy Notice for Students (How we use student information)

You have a legal right to be informed about how our school uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This privacy notice explains how we collect, store and use personal data about you.

We, The Mountbatten School, Whitenap Lane, Romsey, SO51 5SY, are the 'data controller' for the purposes of data protection law.

Our data protection officer can be contacted via dpo@mountbatten.school.

The personal data we hold

We hold some personal information about you to make sure we can help you learn and look after you at school.

For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

This information includes:

- Personal information (such as name, unique student number, address and contact details)
- Identification Documents
- Your attendance records
- Your characteristics, like your ethnic background, language, nationality, country of birth, free school meal eligibility
- Any medical conditions or special educational needs you have
- Details of any behaviour issues or exclusions
- Your test results
- Photographs
- CCTV images
- Monitoring and filtering logs
- Details of any support received including care plans and support providers
- Student and Curricular records
- Modes of travel
- Post 16 learning information
- Biometric Data for the cashless catering system
- Data processed through school authorised Artificial Intelligence tools and cloud platforms

From time to time we may also get additional information such as:

- Travel documentation (passport and GHIC/EHIC information)

Why we collect and use this data
We use this data to help run the school, including to:

- Support your learning and monitor progress
- Get in touch with you and your parents when we need to
- Check how you're doing in exams and work out whether you or your teachers need any extra help
- Track how well the school is performing
- Help the school plan for the future
- Look after your wellbeing
- Provide a safe environment and assist in the prevention of crime via CCTV
- Comply with the law regarding data sharing
- Administer educational trips within the UK and abroad
- Administer the biometric cashless catering system
- Asses the quality of our services and carry out research
- Administer admissions waiting lists
- To monitor and filter use of school systems for security, compliance and safeguarding purposes
- To protect student welfare and carry out safeguarding activities

The lawful basis for using this data

We only collect and use students' personal data and parent/carer contact details when the law allows us to. Most commonly, we process it where:

- Article 6(1)(c) (Legal Obligation): To comply with laws like the Education Act 2011.
- Article 6(1)(e) (Public Task): To perform official school functions.
- Article 6(1)(f) (Legitimate Interests): Specifically for the operation of CCTV for security and crime prevention.
- Article 6(1)(a) (Consent): For optional processing such as promotional photography or biometric data.
- Article 6(1)(d) (Vital Interests): Sharing medical information in an emergency

Special Category Data (e.g., biometrics, health) is processed under Article 9 grounds, such as written consent (required from at least one parent for students under 18) or substantial public interest.

Where we have obtained consent to use students' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

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

The school utilises automated decision-making via Google Workspace for Education (Google Classroom) to automatically mark certain homework and assessments. This processing is intended to provide immediate academic feedback to support student learning. In accordance with your rights, students may object to decisions taken by these automated means and have the right to request a human review of any automatically generated results by contacting their teacher.

Collecting this information

While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether to provide the data.

We will always tell you if it's optional.

Storing student data

We will keep personal information about you while you are a student at our school. We may also keep it after you have left the school, where we are required to by law.

Personal data is stored on school-approved, secured platforms, including Google Workspace for Education and Microsoft 365.
We maintain security through:

- Encryption: Used for data at rest and in transit.
- Multi-Factor Authentication (MFA): for all administrative, remote, and cloud-based accounts to ensure the highest level of security for stored personal data
- Access Control: Access is granted on a role-based, "need-to-know" basis only.
- The school utilizes authorized AI tools to support learning; however, in accordance with our Acceptable Use Policies, personal or sensitive data is strictly prohibited from being input into unauthorized AI platforms.

Our retention schedule sets out how long we must keep information about students. This can be found in our Data Retention Policy.

Key retention periods include:
CCTV Images: 31 days.
Pupil Core Records & SEN Files: Date of Birth (DOB) + 25 years.
Safeguarding/Child Protection Records: DOB + 25 years.
Child Sexual Abuse Records: DOB + 75 years

We have security measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

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

Who we share student information with

We do not share personal information about you with anyone outside the school without permission from you or your parents/carers, 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 students with:

- Our local authority – to meet our legal duties to share certain information with it, such as concerns about students' safety and exclusions

- The Department for Education (a government department) – to meet our legal duties to share certain information with it, such as information about who comes to our school, this enables us to receive school funding as well as to comply with the law. (*regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013*)
- Your family and representatives
- Educators and examining bodies
- Our regulator, Ofsted
- Suppliers and service providers – so that they can provide the services we have contracted them for such as auditors, Professional advisers and counsellors;
  Tour Operators associated with school trips
- Health authorities such as Hampshire County Council's School Nurse and NHS.
- Police forces, courts, tribunals
- Schools/colleges that you attend after leaving us

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to: https://www.gov.uk/education/data-collection-and-censuses-for-schools.

Transferring data internationally

Where data is transferred outside the UK/EEA, we ensure adequate protection is in place through standard contractual clauses or other legally recognised safeguards.

Youth support services

What is different about students aged 13+?

Once our students reach the age of 13, we are legally required to pass on certain information about them to our local authority or youth support services provider, as they have legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables them to provide youth support services, post-16 education and training services, and careers advisors.
Parents/carers, or students, once aged 16 or over, can contact our data protection officer to request that we **only** pass the individual's name, address and date of birth to our local authority and youth support services provider.

For more information about services for young people, please visit our local authority website: https://www.hants.gov.uk/educationandlearning

The National Student Database (NPD)

We are required to provide information about students to the Department for Education as part of statutory data collections such as the school census. Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research. The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with other organisations, which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on how it collects and shared research data and for information about which organisations the department has provided student information (and for which project), please visit the following website:
https://www.gov.uk/government/publications/dfe-external-data-shares

You may also contact the Department for Education with any further questions about the NPD.

Requesting access to your personal data

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them. Parents/Carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent. If you make a subject access request, and if we do hold information about you or your child, we will respond to requests for access to personal data, including CCTV footage, within one calendar month. This may be extended by a further two months for complex cases, in which case you will be notified within the first month.

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact our Data Protection Officer.

Right to Rectification: If you identify inaccurate data, we will respond to your request for correction within one month. This may be extended by a further two months for complex cases, in which case you will be notified within the first month.

Rights to Restrict Processing: you have the right to suppress the processing of your personal data. This allows the school to continue holding the data but prevents any further use of it while we consider requests for rectification or objections to processing.

Rights to Withdraw: To withdraw consent for optional processing (such as biometrics or photography), please contact the Data Protection Officer in writing via dpo@mountbatten.school

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right, subject to some limitations to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations.

For requests regarding non-personal school information, please refer to our Freedom of Information Policy.

Complaints
If you have a concern about how we handle your data, we request that you raise your concern with our Data Protection Officer in the first instance. You also have the right to complain to the **Information Commissioner's Office (ICO)**:

- **Address:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- **Website:** https://ico.org.uk/make-a-complaint/

Contact
If you would like to discuss anything in this privacy notice, please email for the attention of the Data Protection Officer via dpo@mountbatten.school