



**MOWBRAY**  
Education Trust

# Privacy notice for Alumni of our Schools

June 2023

Under UK data protection law, individuals have a right to be informed about how the Trust uses any personal data we hold about them. We comply with this right by providing 'privacy 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.

We, Mowbray Education Trust (Trust), c/o John Ferneley College, Scalford Road, Melton Mowbray, Leicestershire, LE13 1LH, are the 'data controller' for the purposes of UK data protection law.

This policy covers all our educational establishments:

- Ab Kettleby Primary School
- Brownlow Primary School
- The Grove Primary School
- Iveshead School
- John Ferneley College
- Oasis Family Centre
- Sherard Primary School
- Somerby Primary School

Where this policy states 'school' this means any of our educational establishments and the wider Trust.

Our Data Protection Officer is **SPS DPO Services** (see 'Contact us' at the end of this privacy notice).

## 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
- Date of Birth
- Contact details
- Details about your time at the school, including start and leave dates & records of your memories, 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 of your time at the school
- Information required to manage your attendance at alumni events, including access arrangements and dietary requirements

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

## Why we use this data

We use the data listed above to:

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

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.

## Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Comply with a **legal obligation** - we need to process data to meet our responsibilities under law and to keep our pupils and staff safe while on the school premises
- Carry out a task in the **public interest** - we need process data to fulfil our statutory function as a school

Less commonly, we may also use personal information about you where:

- You have given us **consent** to use your personal data in a certain way
- We need to protect your **vital interests** (or someone else's interests) - we will use this personal data in a life-or-death situation
- We have **legitimate interests** in processing the data - where there is a minimal privacy impact and we have a compelling reason
- We have to fulfil a **contract** with you or to help you enter into a contract with us

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

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

## Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- 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
- 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 process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to

confidentiality under law

- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific 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
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

## Collecting this information

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
- Police forces, courts, tribunals

## 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 Policy sets out how long we keep information about alumni, details of which can be requested by e-mailing [dataprotection@mowbrayeducation.org](mailto:dataprotection@mowbrayeducation.org).

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.

## Data sharing

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

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

- Government departments or agencies - to meet our legal obligations to share certain information with them, such as safeguarding concerns
- Our local authority - to meet our legal obligations to share certain information with it, such as details of governance volunteers

- Our regulator, Ofsted
- Our auditors
- Health authorities
- Security organisations
- Suppliers and service providers - to enable them to provide the service we have contracted them for, such as Catering provisions
- Professional advisers and consultants
- Charities and voluntary organisations
- Health and social welfare organisations
- Police forces, courts

## **Transferring data internationally**

Where we transfer personal data to a third-party country or territory, we will do so in accordance with UK 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.

## **Use of your personal information for marketing purposes**

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

You can "opt out" of receiving these texts and/or e-mails at any time by clicking on the "Unsubscribe" link at the bottom of any such communication, or by contacting the Operations Department (see 'Contact us' below).

## **Your rights**

### **How to access the personal information we hold about you**

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- 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 a 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 the Operations Department (see 'Contact us' below).

## Your other rights regarding your data

Under UK data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- 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 the Trust Operations Department (see 'Contact us' below).

## 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.

To make a complaint, please contact our Data Protection Officer.

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

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

## 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**:

### SPS DPO Services

Email: [sps-dpo-services@systemsintegration.com](mailto:sps-dpo-services@systemsintegration.com)

Correspondence address:  
**SPS SPO Services**  
I Systems Integration  
Devonshire House  
29-31 Elmfield Road  
Bromley  
Kent  
BR1 1LT  
Tel: 0208 050 1387

However, the Trust Operations Department has day-to-day responsibility for data protection issues in our schools.

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact them:

**Trust Operations Department**, Mowbray Education Trust, c/o John Fernley College, Scalford Road, Melton Mowbray, LE13 1LH, Tel: 01664 565901 or email [dataprotection@mowbrayeducation.org](mailto:dataprotection@mowbrayeducation.org).

*This notice will be reviewed next by Mowbray Education Trust in Summer Term 2024.*

### Log of Changes to Document

Version	Date	Page	Change	Approver:
V1.0	Nov-21	All pages	New Privacy Notice	AFR Committee
V1.0	Jun-22	All pages	Included Iveshead School from point of transfer	MET Board
V1.0	June 23	Whole document	General document update Change Data Protection lead to Trust operations Department	Audit Finance and Risk Committee