



# CROOKHORN COLLEGE

## Privacy Notice For Students

**Date of Notice:** May 2026

**Review Date:** May 2027

You have a legal right to be informed about how the College 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 students at the College.

We, Crookhorn College, Stakes Hill Road, Waterlooville, Hants PO7 5UD are the 'Data Controller' for the purposes of Data Protection law.

### **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 the College. 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:

- Your contact details
- Your test results, details about your learning and what you have achieved at the College and from previous schools.
- Your attendance records including reasons for absence
- Details of any behaviour issues including any statements provided during an investigation and any suspension information if relevant
- Information about how you use the College IT and communication systems.

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:

- Information about your characteristics, such as your ethnic background or any special educational needs (SEN)
- Information about any medical conditions you have that we have been informed of.
- Photographs, videos and CCTV images

We may also hold data about you that we have received from other organisations, including other schools, local authorities or the police.

## **How we collect this data**

Most of the data we collect is provided by your parents or guardians via

- Forms completed as part of the application process – online or paper based.
- Information provided by you to us during the duration of your child's time with us through emails, phone calls and in-person meetings.
- Transfer files from previous schools.

Information is also collected through CCTV, and any IT system the school has in place, such as email, communication systems and voicemail.

We also collect data from the work you do in class or when you speak to a staff member or write an incident statement for example.

## **Why we use this data**

We use this data to help run the College, including to:

- To support your learning
- Get in touch with your parents or carers when we need to
- Check how you're doing in exams and work out whether you or your teachers need any extra help
- Monitor and report on your progress
- Track how well the College as a whole is performing
- Look after your wellbeing and keep you safe
- Make sure our computers and other systems and equipment are used appropriately, legally and safely
- Publish statistics, for example, about the number of students in the College
- Meet legal requirements placed upon us

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for any other reason and that reason is incompatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

Please note that we may process your personal information without your knowledge or consent in compliance with the above rules where this is required or permitted by law.

## **Use of your personal data in automated decision-making and profiling**

We don't currently put students' personal data through any automated decision-making or profiling process. This means we don't make decisions about you using only computers, without any human involvement.

If this changes in the future, we will update this notice to explain the processing to you, including your right to object to it.

## **Use of your personal data for filtering and monitoring purposes**

While you're in College, we may monitor what material you access on our computers and other IT and communication systems. We do this so we can:

- Comply with health and safety law and other laws
- Comply with our policies for example the College Child Protection Policy and the BYOT Policy.
- Keep our networks and devices safe from people who are not allowed access to them and prevent harmful software from damaging our networks

For students with access to a laptop in College (through the student laptop scheme or provided by you with the monitoring software installed) we may monitor what material you access on this laptop and let your parents know if we have any concerns.

## **Our lawful basis for using this data**

We collect and use your information under the following General Data Protection Regulations (GDPR)

- Article 6(1)(e) – the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- Article 9(2)(g) – the processing is necessary for reasons of substantial public interest.

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- We need to comply with the law
- We need to use it to carry out a task in the public interest (in order to provide you with an education)

Sometimes, we may also use your personal information where:

- You, or your parents/carers have given us permission to use it in a certain way
- We need to protect your interests (or someone else's interest)

Where we have got permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing consent.

Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

## **How we store this data**

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

We have a record retention schedule which sets out how long we must keep information about students which is available for you to see by request.

## **Data sharing**

We do not share personal information about you with anyone outside the College 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 for another reason allowed under Data Protection law, we may share personal information about you with:

- Our local authority, Hampshire County Council – to meet our legal duties to share certain information with it, such as safeguarding concerns and suspension or exclusion information
- Government departments or agencies including the Department for Education
- Schools and Colleges you may attend after leaving us
- Youth support services
- Educators and examining bodies
- Security organisations
- Financial organisations
- Education suppliers and service providers, for example, but not limited to:
  - Learning platforms such as itslearning, Microsoft 365, MathsWatch and Seneca
  - Operation services such as the canteen system
  - The College appointed photographers of the individual and year group photos
- Ofsted
- Our auditors
- Health authorities, including the National Health Service (NHS)
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

## **Sharing data with the Department for Education (DfE)**

We have to share information about you with the Department for Education (a government department) either directly or via our local authority, via various statutory data collections.

The data shared will be in line with Section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013

The data is transferred securely and held by the Department for Education under a combination of software and hardware controls that meet the current government security policy framework.

The data we share about you with the Department for Education is used for a number of different purposes, including to:

- Help decide the amount of money that the College receives
- Monitor how well the education system is working and how well the College is doing in terms of educating our students
- Support research

The information shared with the Department for Education about you could include:

- Your name and address
- Your unique pupil number
- Pupil matching reference numbers
- Details of your gender or ethnicity
- Details of any special educational needs (SEN)
- Details of schools attended
- Absence, suspension and exclusion information
- Information relating to exam results
- Information relating to any contact with children's services
- What you have done since finishing at the College

Please note: this list is not exhaustive.

Once students in the College reach the age of 13, we are legally required to pass on certain information to the local authority or youth services provider, which has responsibilities regarding the education or training of 13 to 19 year olds under section 507B of the Education Act 1996. Parents/carers, or students if aged 16 or over, can request that only their name, address and date of birth be passed to these agencies by informing the data protection officer (DPO).

### **National Pupil Database (NPD)**

We have to provide information about you to the Department for Education (a government department) as part of data collections such as the school census.

Some of this information is then stored in the National Pupil Database, which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

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

You can find more information about this on the Department for Education's webpage on how it collects and shares research data. You can also contact the Department for Education if you have any questions about the database.

### **Transferring data internationally**

Where we transfer your data to a third-party country or territory, we will follow UK data protection law.

## **Your rights**

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

If you are younger than 13, your parents or guardians have the right to make a 'subject access request' to gain access to personal information that we hold about you.

If you are 13 or over, you have a right to make a 'subject access request' to gain access to personal information that we hold about you. If your parents or guardians make this request, we will need to ask you for your consent to pass this data to them.

If you make a subject access request, we will complete this within the statutory timeline of the GDPR and ICO. Any request will be subject to any exceptions that may apply.

You may also ask us to send your personal information to another organisation electronically in certain circumstances. If you want to make a request please contact Mr Adam Brunink, Assistant Headteacher.

### **Your other rights regarding your data**

You have other rights over how your personal data is used and kept safe, including the right to:

- Say that you don't want it to be used if this would cause, or is causing, harm or distress
- Object to the processing of personal data that is likely to cause, or is causing, damage or distress
- Stop it being used to send you marketing materials
- Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- In some cases, have it corrected if it is inaccurate
- In some cases have it deleted or destroyed or restrict our use of it
- Withdraw your consent, where you previously provided consent for your personal information to be collected, processed and transferred for a particular reason
- In some cases be notified of a data breach
- Make a complaint to the Information Commissioner's Office (ICO) if you feel we have not used your information in the right way
- Claim compensation if the Data Protection rules are broken and this harms you in some way

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests

- Right to object to the use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent

## Complaints

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong. You can make a complaint at any time by contacting Mr Adam Brunink, Assistant Headteacher by email at [DPO@crookhorn.hants.sch.uk](mailto:DPO@crookhorn.hants.sch.uk)

You can also complain to the Information Commissioner's Office in one of the following ways:

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

## Contact us

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with Mr Brunink, Assistant Headteacher ([dpo@crookhorn.hants.sch.uk](mailto:dpo@crookhorn.hants.sch.uk)) in the first instance. We will acknowledge receipt of your complaint within 30 calendar days, and we will investigate and respond without undue delay. Further information about the way we handle data protection complaints can be found in our Data Protection Policy, available [here](#).

We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by Adam Brunink, Assistant Headteacher, then you can contact the DPO on the details below.

Data Protection Officer:      Judicium Consultancy Limited  
Address:                              5<sup>th</sup> Floor, 98 Theobalds Road, London. WC1X 8WB  
Email:                                 [dataservices@judicium.com](mailto:dataservices@judicium.com)  
Web:                                     [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)

Should you remain dissatisfied with our response, you also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.