

## Privacy Notice

Vita Multi Academy Trust, Perins School, Sun Hill Junior School, Perins Pre-School

**Effective Date:** December 2025

**Reviewed:** Annually or when processing changes occur

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### 1. Who We Are

Vita Multi-Academy Trust (the Trust) is the Data Controller for the personal data we process. Our registered address is c/o Perins School, Pound Hill, Alresford, Hampshire SO24 9BS.

**Data Protection Officer (DPO):** Phil Segal

**Contact Email:** datamanager@perins.hants.sch.uk

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### 2. What Data We Collect

We collect and process personal data including:

- **Student Information:** Name, date of birth, contact details, assessment records, attendance, safeguarding information
  - **Parent/Carer Information:** Contact details, relationship to student
  - **Staff Information:** Employment details, qualifications, payroll data
  - **Special Category Data:** Health, ethnicity, biometric data (e.g., for cashless catering)
  - **CCTV Images:** For security and safeguarding
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### 3. Why We Collect Data

We process personal data to:

- Deliver education and fulfil statutory duties
  - Safeguard pupils and staff
  - Manage admissions, attendance, and assessments
  - Administer school meals and trips
  - Comply with legal obligations (e.g., DfE reporting)
  - Work with partner organisations where there is a legitimate interest in sharing information
  - Operation of contracts
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### Transparency Links

- [ICO Guidance on Privacy Notices](#)
- [DfE Privacy Notice Templates](#)

#### 4. Lawful Basis for Processing

Under UK GDPR and the Data Protection Act 2018, our lawful bases include:

- **Public Task:** Providing education and safeguarding
- **Legal Obligation:** Compliance with statutory requirements
- **Consent:** For biometric data and certain communications
- **Vital Interests:** Protecting life and wellbeing
- **Contract:** Employment and service agreements
- **Legitimate Interest:** For activities that support the effective operation of the Trust and its schools and do not override your rights and freedoms

**For special category data, we rely on substantial public interest and explicit consent where required.**

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#### 5. How We Use and Share Data

We may share data with:

- Local authorities
- Department for Education (DfE)
- Exam boards
- IT service providers
- Health and safeguarding agencies
- Contractors and other data controllers where we share legitimate interest

We do **not** transfer data outside the UK unless adequate safeguards are in place (e.g., UK adequacy regulations or Standard Contractual Clauses) except for the purposes of trips to countries where data protection law is materially lower than that in the UK when a full risk assessment will be carried out in advance and any mitigations put in place.

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#### 6. Retention Periods

Personal data is retained in line with our Records Management Policy:

- Pupil records: Until age 25
- Safeguarding records: Until age 25
- CCTV: 30 days  
Full retention schedule available on request.

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## 7. Your Rights

Under UK GDPR, you have the right to:

- Access your data
- Request rectification or erasure
- Restrict or object to processing
- Data portability
- Withdraw consent (where applicable)
- Lodge a complaint with the **Information Commissioner's Office (ICO)**:  
<https://ico.org.uk>

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## 8. Biometric Data

Biometric data is processed only with **explicit consent**. Consent can be withdrawn at any time by contacting the school office.

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## 9. Contact Us

For questions or to exercise your rights, contact:

**Data Protection Officer:** [Insert Name]

**Email:** [Insert Email]

**Phone:** [Insert Phone]

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## Child-Friendly Version

A simplified version of this notice is available for pupils in plain language.

## Transparency Links

- [ICO Guidance on Privacy Notices](#)
- [DfE Privacy Notice Templates](#)