Haberdashers'
ABRAHAM DARBY
Aspiration Respect Excellence
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Principal: J Edgar BA Hons; MSc Ed Man; MCCT

FORMER PUPILS' PRIVACY NOTICE
2026

PRIVACY NOTICE – FORMER PUPILS

1. What is the purpose of this document?

1.1. This notice explains how we collect, use, store and share personal information about former pupils of Haberdashers' Abraham Darby ("the school"). It provides you with the information that must be provided under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1.2. The data controller is Haberdashers' West Midlands Academies Trust, Haberdashers' Adams Grammar School, High Street, Newport, Shropshire TF10 7BD, registered with the Information Commissioner's Office under registration number Z1334199. This means the Trust is responsible for deciding how your personal information is held and used.

1.3. This notice applies to you once you have left the school. While you were a pupil, your information was covered by our Privacy Notice for Pupils and Parents.

2. Data protection principles

2.1. We will comply with data protection law and principles, which means that your data will be:

2.1.1. Used lawfully, fairly and in a transparent way.

2.1.2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.

2.1.3. Relevant to the purposes we have told you about and limited only to those purposes.

2.1.4. Accurate and kept up to date.

2.1.5. Kept only as long as necessary for the purposes we have told you about.

2.1.6. Kept securely.

3. The kind of information we hold about you

3.1. We may collect, store and use the following categories of personal information about you:

3.1.1. Your name, date of birth and unique pupil number.

3.1.2. Your contact details (address, email address and telephone number).

3.1.3. The date you left the school.

3.1.4. Your post-16 destination, including the education, training or employment provider and course or role.

3.1.5. Your consent preferences for alumni and careers contact.

3.1.6. Any information you choose to give us through contact with the school, for example by telephone, email, in person or through our social media channels.

3.2. We do not intend to collect special category information (such as health, ethnicity or religion) as part of destinations tracking or alumni contact.

4. How is your personal information collected?

4.1. We collect personal information about former pupils from the following sources:

4.1.1. Our school management information system (SIMS), using the information held about you when you left.

4.1.2. The alumni and careers consent form you complete.

4.1.3. Contact with you after you leave, for example when you confirm your destination.

4.1.4. The Local Authority and post-16 providers, where they share destination information with us for tracking purposes.

5. How we will use information about you, and our lawful basis

5.1. **Destinations tracking.** We use your information to record and report your post-16 destination. We do this for three years after you leave, as required by the Department for Education and the Local Authority. This also supports our careers programme under current DfE statutory careers guidance, the Gatsby Benchmarks and the Ofsted inspection framework.

Lawful basis: Article 6(1)(c), legal obligation, and Article 6(1)(e), public task, including duties under the Education and Skills Act 2008.

5.2. **Alumni contact.** With your consent, we will keep in touch with you to maintain our alumni record.

Lawful basis: Article 6(1)(a), consent.

5.3. **Careers events.** With your consent, we will contact you to invite you to help with careers events, assemblies or other activities that raise pupils' aspirations and show them what is possible.

Lawful basis: Article 6(1)(a), consent.

5.4. **Legal and regulatory requirements.** We use your information to comply with any other legal or regulatory obligations.

Lawful basis: Article 6(1)(c), legal obligation.

5.5. **Withdrawing consent.** Where we rely on your consent, you can withdraw it at any time by contacting hadenquiries@taw.org.uk. Withdrawing consent will not affect any processing carried out before you withdrew it, and it will not affect destinations tracking, which does not rely on consent.

6. Data sharing

6.1. We share your personal information with:

6.1.1. **Telford & Wrekin Council**, which as the Local Authority has a legal duty to track young people's participation in education and training. This data identifies you.

6.1.2. **The Department for Education**, in line with its data collection requirements.

6.1.3. **Service providers acting on our behalf**, such as our management information system provider, IT and email providers, and grofar. They may only process your information on our instructions and must keep it secure.

6.2. Where we use destinations information for our own analysis or reporting, such as evaluating our careers programme or reporting to governors, we use it in anonymised or aggregated form wherever possible.

6.3. We do not sell your information, and we do not share it for marketing by other organisations.

7. Transfers outside the UK

7.1. We do not routinely transfer your personal information outside the UK. Where a service provider stores data outside the UK, we make sure appropriate safeguards are in place, as required by UK GDPR.

8. Automated decision-making

8.1. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

9. Data security

9.1. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees and third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

9.2. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

10. Data retention

10.1. **Destinations tracking data:** we will retain this for 3 years from the date you left the school.

10.2. **Your pupil record:** this is retained in line with our Records Retention Policy.

11. Rights of access, correction, erasure, and restriction

11.1. Under certain circumstances, by law you have the right to:

11.1.1. Request access to the personal information we hold about you (commonly known as a "data subject access request").

11.1.2. Request correction of information that is inaccurate or incomplete.

11.1.3. Request erasure of your information where there is no good reason for us continuing to process it.

11.1.4. Object to processing where we rely on public task, and object at any time to direct marketing.

11.1.5. Request the restriction of processing, for example while the accuracy of your information is checked.

11.1.6. Request the transfer of your information to another organisation, where processing is based on consent.

11.1.7. Withdraw your consent at any time, where we rely on consent.

11.2. Some of these rights are not absolute and depend on the lawful basis we are using. We will normally respond to your request within one month.

11.3. If you want to exercise any of these rights, please contact our Data Protection Officer in writing (details below).

12. Contact Details and Complaints

12.1. We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our Data Protection Lead or Data Protection Officer (details below).

12.2. If you are unhappy with how we have collected or used your personal information, please raise this with us first. You can do this by writing to our Data Protection Officer or Data Protection Lead. We will acknowledge your complaint within 30 days and tell you the outcome without undue delay.

12.3. If you are not satisfied with our response, you can complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Report online: 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.

12.4. Contact details:

Data Protection Lead
Mr R Slack
Haberdashers' Abraham Darby
Ironbridge Road, Madeley, Telford TF7 5HX
Tel: 01952 386000
Email: rob.slack@taw.org.uk

Data Protection Officer
Mr Rob Montgomery – Governance & Audit Mgr
Telford & Wrekin Council
Darby House, Telford TF3 4JA
Tel: 01952 383103
Email: ig@telford.gov.uk