

PRIVACY NOTICE
FOR
PUPILS & PARENTS/FAMILIES/CARERS/LEGAL GUARDIANS
REGARDING PROCESSING OF PERSONAL DATA TO CAUSEWAY
ACADEMY

| Version | Date Published | Responsible Officer |
|----------------|-----------------------|----------------------------|
| 1.0 | May 2026 | Ruth Harkness |
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ABOUT US

Causeway Academy is a new co-educational, non-selective controlled integrated post-primary school opening in **September 2026**.

During the transition period:

- The existing schools act as **data controllers** until personal information is transferred.
- Once transferred, **Causeway Academy becomes the data controller** for that information transferred to them.
- Where information is transferred to the Education Authority (EA), as set out later in this notice, **the EA becomes the data controller** for that information transferred to them.
- The 'three legacy schools' refer to Coleraine College, Dunluce School and North Coast Integrated College.

This privacy notice explains how personal data relating to **pupils and parents/guardians** is collected, shared and used during the transition from the three legacy schools to the newly established **Causeway Academy**.

We are required under the UK General Data Protection Regulation (UK GDPR) to notify you of the information contained in this privacy notice. For the purpose of the transition to Causeway Academy, we will be processing personal data under The Education (Pupil Records and Reporting) (Transitional) Regulations (Northern Ireland) 2007).

This notice applies to prospective, current and former pupils and their families/carers/legal guardians. We may update this notice at any time but if we do so, we will inform you as soon as reasonably practicable.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the UK GDPR.

If you have any questions about this privacy notice or how we handle personal information, please contact the Principal of your legacy school. Contact details can be located on the following sections of the Education Authority's Website:

- [Coleraine College](#)
- [Dunluce School](#)
- [North Coast Integrated College](#)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's details are as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire

SK9 5AF

Telephone: 0303 123 1113

website: <https://ico.org.uk/>

HOW DO WE COLLECT AND HOLD PERSONAL INFORMATION?

Information already held by the legacy schools in the discharge of their public duties will be transferred to Causeway Campus or the Education Authority.

WHAT PERSONAL INFORMATION WILL WE PROCESS?

We will collect, store and use the following categories of personal information about our pupils'/parents/families/carers/legal guardians. Please note that the list below may not be exhaustive.

Pupils

This may include:

- Names, addresses, dates of birth, contact details
- Unique Pupil Number / Unique Learner Number
- Attendance, behaviour, assessment and examination records
- SEN, health, safeguarding and wellbeing information
- Free School Meal and EMA information
- CCTV images
- Where applicable, biometric data (e.g. cashless catering)
- Transport information
- Consent information (e.g. for photographs to be taken, etc.)

Parents and Guardians

This may include:

- Names, contact details and relationship to the pupil
- Parental responsibility information
- Communication preferences

Staff

This may include:

- Contact details and employment information
- National Insurance number and Teacher Reference Number
- Contractual, disciplinary and absence records
- Safeguarding and vetting information (including AccessNI data where required)

Some of this information may be **special category personal data** under UK GDPR (for example health or safeguarding data).

LAWFUL BASIS

For the purpose of this Privacy Notice only, personal data is not being processed on the basis of consent.

Personal data will be processed under the following lawful bases:

- Article 6(1)(e) UK GDPR – Public task. Processing is necessary for the performance of tasks carried out in the public interest, including those set out in The Education (Pupil Records and Reporting) (Transitional) Regulations (Northern Ireland) 2007.
- Article 9(2)(g) UK GDPR – Substantial public interest. For special category data, including safeguarding, SEN and health information.
- Criminal offence data (where applicable). Processed in accordance with the Data Protection Act 2018, where authorised by law.

HOW LONG IS THE INFORMATION STORED FOR?

The legacy schools will cease processing personal data once transferred to Causeway Academy. Thereafter, Causeway Academy will only process personal data in line with its obligations as set out within its privacy notice: <https://causeway-academy.co.uk/privacy-policy/>

This is a link to the Department of Education Document Retention and Disposal Policy which can be found at <https://www.education-ni.gov.uk/publications/disposal-records-schedule>. This will give you more information about how long we keep personal information.

In some instances, historic information (such as information relating to pupils who are no longer enrolled at the legacy schools) will be transferred to the Education Authority (EA), who will manage the retention and disposal of these records in line with their own schedule.

DATA SECURITY

Appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed will be put in place. All parties involved in the transfer of personal data will apply appropriate **technical and organisational security measures**, including:

- Secure transfer via C2K systems
- Encrypted emails and password-protected files
- Restricted system access
- Restricted access to only those employees, agents, contractors and other third parties who have a need to know
- Locked storage for physical records
- Staff training on data protection and confidentiality
- Established procedures for managing any breaches of personal data

WHO WE SHARE PUPIL INFORMATION WITH

For the purposes of this Privacy Notice only, personal data will be shared by legacy schools with:

- Causeway Academy (as the receiving school)

- The Education Authority

WHY WE SHARE PUPIL INFORMATION

Personal data is shared and processed to support the lawful and safe transition to Causeway Academy, including to:

- Enrol pupils for September 2026
- Transfer pupil records required by law
- Put in place appropriate safeguarding and SEN arrangements
- Ensure continuity of education, assessment and examination records
- Transfer staff employment records and facilitate employment by Causeway Academy
- Support the closure of the legacy schools
- Ensure operational readiness of Causeway Academy
- Transfer historic information (i.e. for those pupils no longer enrolled at legacy schools) to the EA, in order for the EA to manage these in line with their obligations

TRANSFERRING INFORMATION OUTSIDE THE UK

Data is not shared outside the UK unless permitted by data protection law and appropriate safeguards are in place.

YOUR RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

Under UK GDPR, pupils/parents/families and carers have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact the Principal (contact details available elsewhere in this Privacy Notice).

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Under certain circumstances, by law a parent/carer/legal guardian or a child over the age of 13 (who is considered competent to do so) has the right to:

- **Request access** to personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and your child and to check that we are lawfully processing it. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- **Request correction** of the personal information that we hold about you and your child. This enables you to have any incomplete or inaccurate information we hold corrected.
- **Request erasure** of personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing you and your child's personal information for direct marketing purposes.
- **Request the transfer** of your personal information to another party, for instance a new school.