

Bolton Impact Trust Student/Work Experience Privacy Notice

How we use student/work experience information

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our academies/trust.

We, Bolton Impact Trust, are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is Mrs Gill Smith (see 'Contact us' below).

Our Director of Academy Operations is Rebecca Leonard (see 'Contact us' below)

The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our academies/trust. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Personal details – name, date of birth
- Contact details
- Next of kin and emergency contact numbers
- Performance information eg. reports to college
- Photographs
- CCTV footage
- Data about your use of the school's information and communications system

Images from CCTV cameras are only used for security purposes

Special Category Conditions

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Health, including any medical conditions, and sickness records
- Disability and access arrangements

Why we use this data

The purpose of processing this data is to help us run the academy/trust, including to:

- As part of our safeguarding obligations towards pupils
- In order to contact you regarding school – related matters eg. school closures, timetabling changes

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. In particular we process personal data in order to meet safeguarding requirements set out in UK Employment and Childcare Law, including those in relation to:

- Safeguarding Vulnerable Groups Act 2000
- The Childcare (Disqualification) Regulations 2009

Most commonly, we use it where we need to:

- Comply with a legal obligation
- Carry out a task in the public interest

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

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

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 the school's use of your data.

Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

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.

How we store this data

Personal data is stored in line with our Data Protection, Information Management and Retention Policy which can be found on the Trust website.

Information about individual students will be destroyed as far as possible at the end of their placement.

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.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Your rights

How to access 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 the 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 our Data Protection Officer or Director of Academy Operations (Contact details below). Further details and a Subject Access Request form are on the Trust website. You are entitled to submit subject access requests all year round, but please bear in mind that it may be necessary for us to extend the response period when requests are submitted over the summer holidays. This is in accordance with article 12(3) of the GDPR and will be the case where the request is complex – for example, where we need multiple staff to collect the data.

Your other rights regarding your data

Under 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 by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Seek compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

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 or Director of Academy Operations. Alternatively, you can make a complaint to the Information Commissioner's Office:

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

Contact details

Data Protection Officer

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Director of Academy Operations

Miss Rebecca Leonard

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