

# **Privacy Notice Policy**

Policy type	Statutory
Review period	Annual
Last reviewed on	15 <sup>th</sup> July 2024
Next review due	Summer 2025
Approval level	CEO
Number and Version	020 V23
Published on	Website and Staff Area

Version Number	Purpose/Change	Author	Date
V1.0	Scheduled review	DPO, Corinne Gould	04-Nov-2020
V2.0	Included pupils and staff; removed reference to EU	DPO, Corinne Gould	17-Jan-2022
V2.1	Updated contact details	DPO, Corinne Gould	06-Apr-2022
V2.2	Updates in line with DfE recommendations	DPO, Lee Miller	21-Jul-2023
V2.3	Updates in line with DfE recommendations and good practice	DPO, Lee Miller & Angela Barry, CEO	15-Jul-2024

## **CONTENTS**

Privacy Notice for Parents/Carers	4
Privacy Notice for Pupils	8
Privacy Notice for Staff	12
Privacy Notice for Governance Roles	16

## 1. Privacy Notice for Parents/Carers

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 pupils. We, Parallel Learning Trust, Suite 1, Wandle Valley Academy, Welbeck Road, Carshalton, SM5 1LW are the 'data controller' for the purposes of data protection law.

Our data protection officer is Lee Miller (see 'Contact us' below).

## 1.1. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about pupils includes, but is not restricted to:

- Contact details, contact preferences, date of birth,
- Characteristics, such as ethnic background, eligibility for free school meals,
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- CCTV images captured in school

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

## 1.2. Why we use this data

We use this data to:

- Support pupil learning
- Provide appropriate pastoral care
- Protect pupil welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing
- Keep children safe
- Fulfil our legal requirements

## 1.3. Our legal basis for using this data

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Less commonly, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which justify our use of this data.

## 1.4. Collecting this information

While the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

## 1.5. How we store this data

We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations.

## 1.6. Data sharing

We do not share information about pupils with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about pupils with:

- Our local authority to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- The Department for Education
- The pupil's family and representatives
- Educators and examining bodies
- Our regulator [specify as appropriate, e.g. Ofsted, Independent Schools Inspectorate]
- Suppliers and service providers to enable them to provide the service we have contracted them for
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

- Professional bodies
- Providers of services to the school such as travel companies and school trip providers

## 1.7. National Pupil Database

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census which occur three times each academic year.

Some of this information is then stored in the <u>National Pupil Database</u> (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

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

For more information, see the Department's webpage on <u>how it collects and shares research</u> data.

You can also <u>contact the Department for Education</u> with any further questions about the NPD.

## 1.8. Youth support services

Once our pupils reach the age of 13, we are legally required to pass on certain information about them to their Local Education Authority as it has legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Parents/carers, or pupils once aged 16 or over, can contact our data protection officer to request that we only pass the individual's name, address and date of birth to the Local Education Authority.

## 1.9. Transferring data internationally

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

## 1.10. Parents/carers and pupils' rights regarding personal data

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

Parents/carers also have the right to make a subject access request with respect to any personal data the school holds about them.

Individuals also have the right for their 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.

## 1.11. Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Prevent it being used to send direct marketing
- Object to 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
- Claim compensation for damages caused by a breach of the data protection regulations

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

## 1.12. 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; Lee Miller at the Trust office by emailing: Imiller@plt.org.uk

If you are not satisfied with the outcome of your complaint to our Data Protection Officer, you can make a complaint to the Information Commissioner's Office:

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

## 1.13. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact Lmiller@plt.org.uk

This notice is based on the <u>Department for Education's model privacy notice</u> for pupils, amended for parents/carers and to reflect the way we use data in this school.

## 2. Privacy notice for pupils

You have a legal right to be informed about how our school 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 you. We, Parallel Learning Trust, Wandle Valley Academy, Welbeck Road, Carshalton. SM5 1LW.

## 2.1. 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 school.

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 personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- Your test results
- Your safeguarding information
- Your attendance records
- Your characteristics, like your ethnic background or any special educational needs
- Any medical conditions or allergies you have
- Details of any behaviour issues or exclusions
- Photographs/CCTV images
- Bio metric data, if applicable.

## 2.2. Why we use this data

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

- Providing you with education and support services
- Get in touch with you and your parents/carers when we need to
- Check how you're doing in exams and work out whether you or your teachers need any extra help
- To keep you safe (food allergies, wellbeing, or emergency contact details)
- Track how well the school as a whole is performing
- Look after your wellbeing
- Promote the school

Under the <u>UK General Data Protection Regulation (UK GDPR)</u>, UK GDPR – Article 6, the lawful bases we rely on for processing pupil information are:

- For the purposes of **(a)**, **(b)**, **(c)** & **(d)** in accordance with the legal basis of Public Task: collecting the data is necessary to perform tasks that schools are required to perform as part of their statutory function
- For the purposes of **(e)** in accordance with the legal basis of Vital interests: to keep children safe (food allergies, or medical conditions)

• For the purposes of **(f)** in accordance with the legal basis of Legal obligation: data collected for the Department for Education (DfE) census information

In addition, concerning any special category data:

• In the case of ethnicity and fingerprint information: condition a: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject.

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.

## 2.3. Collecting this information

We obtain pupil information via registration forms at the start of each academic year. In addition, when a child joins us from another school, we are sent a secure file containing relevant information.

Pupil data is essential for the schools' operational use. Whilst most of the pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with UK GDPR we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this and we will tell you what you need to do if you do not want to share this information with us.

#### 2.4. How we store this data

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

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information regarding our data retention schedule and how we keep your data safe, please visit PLT Data Protection Policy.

## 2.5. Data sharing

We do not share personal information about you with anyone outside the school 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 – to meet our legal duties to share certain information with it, such as concerns about pupils' safety and exclusions

- The Department for Education (a government department)
- Your family and representatives
- Youth support services (pupils aged 13+)
- Educators and examining bodies
- Our regulator (the organisation or "watchdog" that supervises us e.g. Ofsted)
- Suppliers and service providers so that they can provide the services we have contracted them for
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

We would usually share any data via a secured link/password protected files. For more information regarding our data retention schedule, please visit PLT Data Protection Policy.

## 2.6. National Pupil Database

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to provide information about you to the Department for Education (a government department) either directly or via our local authority for the purpose of those data collections under <u>Regulation 5 of The</u> Education (Information About Individual Pupils) (England) Regulations 2013.

All data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls, which meet the current government security policy framework.

Some of this information is then stored in the <u>National Pupil Database</u>, 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 <u>contact the Department for Education</u> if you have any questions about the database.

## 2.7. Youth support services

Once you reach the age of 13, we are legally required to pass on certain information about you to your Local Education Authority as it has legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Your parents/carers, or you once you're 16, can contact our data protection officer to ask us to only pass your name, address and date of birth to your Local Education Authority.

Data is securely transferred to the youth support service via a secure file transferring system and is stored within local authority software.

For more information about services for young people, please visit your local authority website

## 2.8. Transferring data internationally

Where we share data with an organisation that is based outside the UK, we will protect your data by following data protection law.

## 2.9. Your rights

How to access personal information we hold about you

You can find out if we hold any personal information about you, and how we use it, by making a 'subject access request', as long as we judge that you can properly understand your rights and what they mean.

If we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you or your parents/carers
- Tell you who it has been, or will be, shared with
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information

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 our data protection officer, Lee Miller at <a href="mailto:lmiller@plt.org.uk">lmiller@plt.org.uk</a>

## 2.10. Your other rights over your data

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

- 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)
- Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it

 Claim compensation if the data protection rules are broken and this harms you in some way

## 2.11. 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 our data protection officer.

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

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

#### 2.12. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our DPO, Lee Miller: Lmiller@plt.org.uk

This notice is based on the <u>Department for Education's model privacy notice</u> for pupils, amended to reflect the way we use data in this school.

## 3. Privacy notice for Employees

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 school.

We, Parallel Learning Trust, Wandle Valley Academy, Welbeck Road, SM5 1LW are the 'data controller' for the purposes of data protection law

#### 3.1. The personal data we hold

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

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process

- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs/CCTV footage
- Data about your use of the school's information and communications system
- Criminal records history in line with DBS requirements

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
- Trade union membership
- Health, including any medical conditions, and sickness records

## 3.2. Why we use this data

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body
- Provide education to pupils
- Fulfil legal obligations

Under the <u>UK General Data Protection Regulation (UK GDPR)</u>, UK GDPR – Article 6, the lawful bases we rely on for processing pupil information are:

- For the purposes of **(a)**, **(b)**, **(c)** & **(d)** in accordance with the legal basis of Public Task: collecting the data is necessary to perform tasks that schools are required to perform as part of their statutory function
- For the purposes of **(e)** in accordance with the legal basis of Vital interests: to keep children safe (food allergies, or medical conditions)
- For the purposes of **(f)** in accordance with the legal basis of Legal obligation.

In addition, concerning any special category data:

In the case of ethnicity and fingerprint information: condition a: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject.

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.

## 3.3. Collecting this information

We collect personal information via application forms at the start of your employment. As well as staff contract forms and signed declarations.

Workforce data is essential for the school's / local authority's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with UK GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

#### 3.4. How we store this data

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our record retention schedule. For more information regarding our data retention schedule and how we keep your data safe, please visit <a href="PLT Data Protection">PLT Data Protection</a> Policy.

## 3.5. 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.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Our local authority to meet our legal obligations to share certain information with it, such as safeguarding concerns and [maintained schools only] information about headteacher performance and staff dismissals
- The Department for Education
- Educators and examining bodies
- Our regulator [specify as appropriate e.g. Ofsted, Independent Schools Inspectorate]
- Suppliers and service providers to enable them to provide the service we have contracted them for, such as payroll
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Trade unions and associations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

Employment and recruitment agencies

## 3.6. Local authority

We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

## 3.7. Department for Education (DfE)

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our children and young people with the Department for Education (DfE) for the purpose of those data collections, under:

We are required to share information about our school employees with the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

All data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls which meet the current government security policy framework.

For more information, please see 'How Government uses your data' section

## 3.8. Transferring data internationally

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

#### 3.9. 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.

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, Lee Miller, Lmiller@plt.org.uk

## 3.10. 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:

- 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

 Claim compensation for damages caused by a breach of the data protection regulations

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

## 3.11. 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.

Alternatively, you can make a complaint to the Information Commissioner's Office:

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

#### 3.12. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Lee Miler at our Trust office by emailing Lmiller@plt.org.uk

This notice is based on the <u>Department for Education's model privacy notice</u> for the school workforce, amended to reflect the way we use data in this school.

## 4. Privacy notice for Governance Roles – How we use your personal information on Get Information about Schools (GIAS)

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 school.

We, Parallel Learning Trust, Wandle Valley Academy, Welbeck Road, SM5 1LW are the 'data controller' for the purposes of data protection law.

## 4.1. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Personal identifiers, contacts and characteristics (such as name, date of birth, contact details and postcode)
- Nationality for trustees only
- Governance details (such as role, start and end dates and governor id)

- Criminal records history in line with DBS requirements
- Bank account details if making expenses claim

## 4.2. Why we use this data

The personal data collected is essential, in order for the school, academy or academy trust to fulfil their official functions and meet legal requirements.

We collect and use governance information, for the following purposes:

To meet the statutory duties placed upon us

Under the <u>UK General Data Protection Regulation (UK GDPR)</u>, UK GDPR – Article 6, the lawful bases we rely on for processing pupil information are:

 for the purpose a) named above in accordance with the legal basis of legal obligation

All local authority maintained school governing bodies, under <u>section 538 of the Education Act</u> <u>1996</u> and academy trusts, under the <u>Academies Financial Handbook academy trust handbook</u> have a legal duty to provide the governance information as detailed above.

In addition, concerning any special category data:

In the case of ethnicity and fingerprint information: condition a: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject.

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.

## 4.3. Collecting this information

We collect personal information via application forms upon your appointment.

Governance roles data is essential for the school, academy or academy trust's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it may be requested on a voluntary basis. In order to comply with UK-GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

#### 4.4. How we store this data

We create and maintain a file for each member. The information contained in this file is kept secure and is only used for purposes directly relevant to your term.

Once your term with us has ended, we will retain this file and delete the information in it in accordance with our record retention schedule. For more information regarding our data retention schedule and how we keep your data safe, please visit PLT Data Protection Policy.

#### 4.5. 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.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Our local authority to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about headteacher performance and staff dismissals
- The Department for Education

## Local authority

We are required to share information about our governance roles with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Department for Education (DfE)

The Department for Education (DfE) collects personal data from educational providers and local authorities. We are required to share information about individuals in governance roles with the Department for Education (DfE), under:

We are required to share information about individuals in governance roles with the Department for Education (DfE) under the requirements set out in the <u>Academies Financial Handbook academy trust handbook</u>

All data is entered manually on the GIAS service and held by the Department for Education (DfE) under a combination of software and hardware controls which meet the current government security policy framework.

For more information, please see the 'How Government uses your data' section.

## 4.6. Transferring data internationally

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

## 4.7. Your rights

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact Imiller@plt.org.uk

You also have the right to:

- ask us for access to information about you that we hold
- have your personal data rectified if it is inaccurate or incomplete
- request the deletion or removal of personal data where there is no compelling reason for its continued processing
- restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics

 not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the <a href="How Government uses your data">How Government uses your data</a>" section of this notice.

## 4.8. 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 Lee Miller at <a href="mailto:Lmiller@plt.org.uk">Lmiller@plt.org.uk</a>

Alternatively, you can make a complaint to the Information Commissioner's Office:

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

## 4.9. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our DPO by emailing <a href="mailto:lmiller@plt.org.uk">lmiller@plt.org.uk</a>

This notice is based on the <u>Department for Education's model privacy notice</u> for the governance role, amended to reflect the way we use data in this school.

## 4.10. How government uses your data

The governance data that we lawfully share with the Department for Education (DfE) via GIAS will:

- increase the transparency of governance arrangements
- enable local authority maintained schools, academies, academy trusts and the Department for Education (DfE) to identify more quickly and accurately individuals who are involved in governance and who govern in more than one context
- allow the Department for Education (DfE) to be able to uniquely identify an individual and in a small number of cases conduct checks to confirm their suitability for this important and influential role

## 4.11. Data collection requirements

To find out more about the requirements placed on us by the Department for Education (DfE) including the data that we share with them, go to <a href="https://www.gov.uk/government/news/national-database-of-governors">https://www.gov.uk/government/news/national-database-of-governors</a>

Some of these personal data items are not publicly available and are encrypted within the GIAS system. Access is restricted to authorised Department for Education (DfE) and education establishment users with a Department for Education (DfE) Sign-in (DSI) account who need to see it in order to fulfil their official duties. The information is for internal purposes only and not shared beyond the Department for Education (DfE) unless the law allows it.

4.12. How to find out what personal information the Department for Education (DfE) hold about you

Under the terms of the <u>Data Protection Act 2018</u>, you're entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a subject access request (SAR). Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter

To contact DfE: <a href="https://www.gov.uk/contact-dfe">https://www.gov.uk/contact-dfe</a>