



## **Privacy Notice**

### **GDPR\_REC\_4.1**

<b>Policy Version Control</b>	
Policy type	Academy Trust
Policy prepared by (name and designation)	Heather Ferguson Director of Operations
Last review date	15 <sup>th</sup> May 2018
Description of changes	To reflect the need to transfer pupil data to secondary education prior to new academic year or change school.
Date of Board of Trustees approval	28 <sup>th</sup> March 2019
Date released	29 <sup>th</sup> March 2019
Next review date	Summer 2020

# Document Owner & Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above.

A current version of this document is available to all members of staff on the Trust Shared Area.

This manual was approved by the Board of Trustees on 15<sup>th</sup> May 2018 and is issued on a version controlled basis under the signature of GDPR Trustee.

Signature:

Date:

## 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

## 2. Responsibilities

- 2.1 The Data Protection Officer (DPO) is responsible for ensuring that this notice is made available to data subjects prior to Lingfield Education Trust collecting/processing their personal data.
- 2.2 All staff of Lingfield Education Trust who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

## 3. Privacy notice

### 3.1 Who are we?

We are a trust family of six schools in the Tees Valley, Heathfield Primary, Hurworth Primary, Northwood Primary, Corporation Road Primary, Mount Pleasant Primary & Hemlington Hall Academy. We also have a Speech & Language Resource Base, SEND Resource Bases for pupils with Complex Learning Needs, Social Communication provision for children with Social Communication difficulties and we also manage the Low Incidence Needs Team for Darlington.

Our Data Protection Officer (DPO) and data protection representatives can be contacted directly here:

- [dpo@itsystems.uk.net](mailto:dpo@itsystems.uk.net)
- 0843 8868661

The personal data we would like to collect from you is:

<b>Personal data type:</b>	<b>Source</b> (where Lingfield Education Trust obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
<b>STAFF ADMINISTRATION</b>	
Name	Appointment of Employment
Address	Appointment of Employment
Contact details	Appointment of Employment
Health details	Appointment of Employment
DBS check	Pre-Appointment
Passport/driving licence/utility bill	Appointment of Employment
Telephone numbers & email address	Appointment of Employment
National Insurance number	Appointment of Employment
Performance Management	After Three Months of Employment then Annually

Appointment details	Appointment of Employment
Contract of employment	Appointment of Employment
Bank account details	Appointment of Employment
Pre-Tax Payment (Student Loan / Childcare Vouchers)	Appointment of Employment
Annual leave	During Employment
Emergency contact name	Appointment of Employment
Emergency contact details	Appointment of Employment
Pension details	Appointment of Employment
References	Pre-Appointment
Internet History	Appointment of Employment
<b>COMPANY ADMINISTRATION</b>	
Name	Appointment of Works
Address	Appointment of Works
Contact details	Appointment of Works
<b>CUSTOMER ADMINISTRATION</b>	
Name	SLA Contract
Address	SLA Contract
Contact details	SLA Contract
Internet History	SLA Contract
Backup Data	SLA Contract
<b>SUPPLIER ADMINISTRATION</b>	
Name	SLA Contract
Address	SLA Contract
Contact details	SLA Contract

The personal data we collect will be used for the following purposes:

- To carry out our obligations arising from any contracts entered and/or entering into by you and us
- Notify you of changes to our services
- Send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other activities, promotions of our associated companies goods and services
- Process a job application
- To ensure safeguarding of all individuals (staff and pupils)
- Facilitate the legal and regulatory requirements of local and central government departments
- To ensure the safety of persons whilst within our premises (health & safety and medical)
- Provide the highest levels of education provision to the pupils in our care
- Enable the development of a comprehensive picture of the workforce and how it is deployed (School workforce)
- Inform the development of recruitment and retention policies
- Enable individuals to be paid

Our legal basis for processing for the personal data:

- Contractual obligation(s) arising from any contracts entered and/or entering into by you and us
- Legal obligations arising from any requirements and/or statutes from Central Government departments (Department of Education / Education Skills and Funding Agency)
- Explicit consent given to provide information about upcoming events, activities, campaigns and news associated to our Trust.

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Marketing ventures on the Trust's behalf

The special categories of personal data concerned are:

- Racial
- Ethnic origin
- Political opinions
- Religious beliefs
- Philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Health data
- Data concerning a natural person's sex life
- Sexual orientation

### 3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Lingfield Education Trust to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time.

### 3.3 Disclosure

Lingfield Education Trust will not pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

Third-party organisation	Safeguards in place to protect your personal data	Reasons for sharing:
Our local authority	Encrypted data transfer in the EEA	We are required to share information about our workforce members with our local authority (LA) under section five of the Education Regulations 2007 and amendments.
The Department of Education	Encrypted data transfer in the EEA	We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring,

		evaluation and links to school funding / expenditure and the assessment educational attainment.
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### 3.4 **Retention period**

Lingfield Education Trust will process personal data for up to three months after termination of employment and will store the personal data for up to six months post-termination.

### 3.5 **Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

### 3.6 **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Lingfield Education Trust (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Lingfield Education Trust data protection representatives Data Protection Officer (DPO).

The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>Data Protection Officer (DPO) contact details</b>
Contact Name:	Complaints Department	Data Protection Officer
Address line 1:	Information Commissioner's Office	Lingfield Education Trust

Address line 2:	Wycliffe House	Lingfield House
Address line 3:	Walter Lane	Lingfield Point
Address line 4:	Wilmslow	Darlington
Address line 5:	Cheshire	DL1 1RW
Address line 6:	SK9 5AF	
Email:	<a href="https://ico.org.uk/concerns">https://ico.org.uk/concerns</a>	dpo@itsystems.uk.net
Telephone:	0303 123 1113	0843 8868661

### 3.7 **Privacy statement**

Read more about how and why we use your data here

<https://lingfieldeducationtrust.com/privacy-policy>

## 4. **Online privacy statement**

### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

### Who are Lingfield Education Trust?

We are a trust family of six schools in the Tees Valley, Heathfield Primary, Hurworth Primary, Northwood Primary, Corporation Road Primary, Mount Pleasant Primary & Hemlington Hall Academy. We also have a Speech & Language Resource Base, SEND Resource Bases for pupils with Complex Learning Needs, Social Communication provision for children with Social Communication difficulties and we also manage the Low Incidence Needs Team for Darlington.

### What does Lingfield Education Trust collection your information for?

We obtain information about you when you use our website.

We collect information on your child/children to educate them in a secure, safe and nurturing environment. We address any specific needs your child/children may have to make their learning experience the best it possibly can be.

We also collect parental information to keep you informed of your child's/children's progress in school as well as opportunities that may present themselves during the academic year.

We also collect information when you voluntarily complete surveys, undertake enquiries on our website, log requests with us, provide feedback to us and participate in any events we may hold.

We use pupil's data:

- To support pupil learning
- To monitor and report on pupil progress
- To provide appropriate pastoral care
- To assess the quality of our services
- To comply with the law regarding data sharing
- To enable us to carry out specific functions for which we are responsible
- Assess performance and to set targets for schools

#### How does Lingfield Education Trust use your information?

In order for us to provide your child/children with the best experience at Lingfield Education Trust we need to collect personal data to enable us to educate your child/children under the requirements set by The Department of Education and the Education Funding Agency. All information relating to your child/children is used to enhance their personalised learning goals and if additional support is required for SEN or health-related matters.

Data relating to a person(s) of parental responsibilities is used to keep them informed of their child's/children's progress and for emergency purposes.

In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

#### What about marketing?

In terms of being contacted for marketing purposes Lingfield Education Trust would contact you for additional consent.

We are really proud of the things we do at our Trust and we are keen to tell people about the wonderful things we do. We would like to send you information about our news and services which may be of interest to you. If you have consented to receive marketing, you may opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes or giving your information to third parties. If you no longer wish to be contacted for marketing purposes, please contact us immediately.

#### Will Lingfield Education Trust share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Lingfield Education Trust in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Lingfield Education Trust's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

We share pupil's data with other schools for information sharing purposes in preparation to accept new pupils into our Trust of schools. We also share pupil information in preparation for the time when pupils leave our care and move on to new educational establishments.



We share pupil's data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

How will Lingfield Education Trust use the personal data it collects about me?

Lingfield Education Trust will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Lingfield Education Trust is required to retain certain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific government requirements, business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Lingfield Education Trust contact me?

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

What if the information you have on me is inaccurate?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

Lingfield Education Trust at your request, can confirm what information we hold about you and how it is processed. If Lingfield Education Trust does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Lingfield Education Trust or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.

- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Lingfield Education Trust accepts the following forms of ID when information on your personal data is requested such as:

- Passport
- driving licence
- birth certificate
- utility bill (from last 3 months)

Contact details of the Data Protection Officer (DPO):

	<b>Data Protection Officer (DPO) contact details</b>
Contact Name:	DPO
Address line 1:	Lingfield Education Trust
Address line 2:	Lingfield House
Address line 3:	Lingfield Point
Address line 4:	Darlington
Address line 5:	DL1 1RW
Address line 6:	
Email:	dpo@itsystems.uk.net
Telephone:	0843 8868661

**Policy Review Date: Summer 2020**