Privacy notices

July 2020

Published date:	Next review deadline:	Statutory	Executive Lead at ATT:
July 2020	July 2023		Andy Gannon Head of Corporate Affairs

Associated documents:	
Links to:	
• Data protection policy • Freedom of Information policy	

This document contains our privacy notices for sharing with groups as appropriate.

The *Privacy statement for website* should appear in an obvious place on the academy website with this full document available as a link.

The *Privacy notice for website users* must also be available separately on the academy website – usually in the bar at the bottom of the website.

Our Vision

We have one core purpose:
To have the biggest positive impact in the varied communities we serve through ensuring top drawer education for our learners. #TransformingLives

How do we ensure this across our trust?
In all we do we are:

1. Ethical to the core, ensuring that education is always front and centre
2. Futures focused system leaders – never simply followers
3. Collaborative in every endeavour
4. Resolutely learner centred.

What does this look like across our trust?
Education
We are:

1. Ruthlessly ambitious for all who learn and work with us
2. Unwaveringly inclusive – determined on eradicating barriers to educational success
3. Committed to excellent teaching
4. Determined upon academic excellence for all in our communities
5. Compassionate, ethical and caring advocates for all in our communities
6. Outwardly facing and globally conscious

Operations
We are:

1. Committed to the very best people development and empowerment
2. Determined to shout loudly and share proudly our successes
3. The best professional and technical experts (supporting education) in the sector
4. Committed to the very best understanding and management of risk

Financial
We are:

1. Providing the best possible public service for the best possible value
2. Determined to supplement our public income with shrewd income generation
3. Building financially sustainable models of educational improvement in our communities
4. Demonstrably efficient in all we do

Our values

- We will work inclusively within our communities, embracing the varied localities we serve while sharing our common vision and values.
- We will develop the very best leaders of the future, working to improve education and transform lives.
- We will adhere unwaveringly to the 'Nolan Principles' of Public Service, which is made clear in our commitment to Ethical Leadership.

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1 Privacy statement for website

At Academy Transformation Trust, we collect and use certain types of personal information about staff, students, parents, those involved in our governance, visitors and other individuals who come into contact with us as we go about providing our core services.

We will ensure that all personal data is collected, stored and processed in accordance with the General Data Protection Regulation and with the Data Protection Act 2018. Our *Data protection policy* details how we will do this.

The privacy notices contained in the document below offer more detailed information about how we deal with personal data for specific groups of people.

Academy Transformation Trust is the data controller for the purposes of all data protection legislation. We are registered for this purpose with the Information Commissioner's Office (ICO). Our registration number is Z3277414.

We have a Data Protection Officer (DPO), who is currently Andy Gannon, our Head of Corporate Affairs. Andy is supported by a network of Data Protection Leads (DPLs), one in each of our academies.

We take any complaints about our collection and processing of personal data very seriously. If you have any concerns in this regard, please ask initially to speak with the DPL in the relevant academy or raise it with the DPO at DPO@academytransformation.co.uk. All complaints will be dealt with in accordance with our complaints policy.

2 Privacy notice for website users

This website privacy statement details our approach to the collection and use of personal information for visitors to any of our websites. This includes individual academy websites. We are committed to the principles of data protection legislation and will therefore only collect, store and process information which is necessary for you to benefit from our on-line presence.

Purpose of this notice

This notice tells you

- what information we might collect about you, both identifiable and personally non-identifiable, during a visit to our websites or when you use our online tools, including those designed for online learning and staff recruitment
- how we might use that information
- what information of yours we might legitimately share with other organisations
- your choices about the information you give us.

What this notice does not cover

There are often links on our websites to external organisations, such as the Department for Education or services provided by external contractors. Please note that each of these websites will have its own privacy policy and that any information you provide having followed a link from our websites to their will be subject to their rules and not ours.

Our commitment

We are committed to only collecting information which is necessary and to keeping that information safe. Please let us know if you have any concerns about how we do this.

Storing cookies, analytics and personal information

Cookies are small pieces of data that our websites transfer to the user's computer hard drive when you visit them. Our websites use only 'session cookies', which are erased when you close your web browser. Session cookies do not collect information from your computer. They also do not personally identify you.

You can change the way in which your browser uses cookies in the browser's settings.

What do we collect?

When you visit our websites we will collect and process the following information, for our own use only:

- the details of the page or downloaded requested
- whether the request was successful or not
- the date and time of access to the site
- the internet address of the website or the domain name of the computer from which you accessed our site
- details of the operating system of the machine running your web browser and the type and version of your web browser.

Collecting this information enables us to maintain a high level of security around our websites. For those who simply visit our websites, we will never pass the information on, unless required to as part of a legal or criminal investigation.

If you engage with our online learning and/or recruitment services, you will be asked to enter manually additional personal information. At that point, you should refer to the privacy notice for staff, students or parents (as appropriate) for details of what we will do with the information provided.

Changes to this notice

We update this notice regularly and will always ensure that the most up-to-date version is available on our website. Please ensure you have checked to ensure that you understand the current privacy notice when you engage with our websites.

Contact

If you have any questions relating to this privacy notice or would like to offer us feedback, please contact our DPO at DPO@academytransformation.co.uk.

3 Privacy notice for students

Introduction

Under data protection law you have a right to be informed about how we use any personal data that is held about you. This **privacy notice** is designed to provide you with that information and to make sure that we, Academy Transformation Trust and our academies, are complying with the law.

Data controller and data processors

Academy Transformation Trust is the **data controller** for the purposes of data protection law. We are therefore the organisation in charge of how your personal information is collected and used.

Your academy, along with some authorised third party organisations (such as ParentPay) collect, process and 'use' data on our behalf and are therefore **data processors**.

The postal address of Academy Transformation Trust is Unit 4 Emmanuel Court, Reddicroft, Sutton Coldfield B73 6AZ.

If you want to contact us about your personal information you can contact the Data Protection Lead within the academy. You can speak to them in school or you can leave a letter at reception or send one by post.

The Trust's Data Protection Officer is Andy Gannon, who can be contacted at DPO@academytransformation.co.uk.

We will ensure that your personal data is processes fairly and lawfully, is accurate, is kept secure and is stored for no longer than necessary.

The categories of personal data we hold

We hold information about you to make sure that we can help you to learn and keep you safe while you are at school. For the same reasons, we also get information about you from some other places, such as other schools, the local authority and the government.

We hold information including

- personal information – your name, unique student number, address and contact details and details of your parents or carers
- your characteristics – such as ethnicity, language, nationality, country of birth and religion
- attendance information – such as the number of sessions attended and reasons for absence
- information from social services – relating to safeguarding, usually, or care status
- test results – including national curriculum assessment results and internal exam results
- special educational needs information and free school meal eligibility
- information about any relevant medical conditions or needs you may have
- details of any behaviour issues or exclusions
- details of where you move on to after leaving us (your 'destination')
- other information, including photographs, images on CCTV and biometric data (in some cases).

Why we use this data

We use this data to help run our academies, including to

- support your learning

- look after your wellbeing
- check how you are doing in exams and work out if you need extra help
- report on your progress
- get in touch with your parents or carers if we need to
- track how well the academy as a whole is performing
- provide pastoral care
- protect vulnerable individuals
- prevent and detect crime
- provide references for employment.

Our lawful basis for using this data

We will only collect and use your information where the law allows us to. Most often we will use your information where

- we need to in order to comply with the law
- we need to use it to carry out a task in the public interest (this includes providing you with an education).

Sometimes we will also use your personal information where

- you, or your parents/carers have given us permission (known as consent) to use it in a particular way
- we need to protect your (or someone else's) health interests.

If we ask for permission from you and/or your parent/carer to use information, you can withdraw this permission at any time. We will make this clear when we ask for permission and tell you how to go about withdrawing it.

Some of our reasons for using data overlap, and there may be several reasons that justify our use of your data.

Collecting the information

In most cases, you and/or your parent/carer will provide the data we use. Sometimes, you can choose whether or not to give it to us. Sometimes, we also get information from previous schools, the Department for Education or the local authority.

If you are over the age of 14 when you enrol with us, the Learning Records Service will also give us the unique learner number (ULN) and may also give us details about your qualifications.

We will always tell you if you have a choice about whether or not to provide information. If you do not have a choice, we will also explain what will happen if you do not provide it.

We will usually ask your parent/carer to also give permission if we need to use your information for a reason that requires it, but, is we believe you can understand what is being asked, then the decision to give permission will be yours.

How we store the data

We will keep personal information about you while you are a student at one of our academies. We will also keep it after you have left where we are required to by law.

You can find out how long we will keep your information in the 'retention and destruction of data' section of our *Data protection policy*.

We may keep information about you in a variety of formats, including on paper, electronically or in the form of video or audio recordings.

Data sharing

We will not share personal information about you with any third party without your permission unless the law and our policies allow us to.

Where it is legally required, or necessary for another reason under data protection law, we may share personal information about you with

- the local authority – to meet our legal obligations in regard to areas such as safeguarding
- the Department for Education – to meet our legal obligations in regard to areas such as the School Census
- your family or representatives – in case of emergencies such as a health matter
- schools or educational institutions you may move on to – in the interests of continuing to deliver the public interest of providing education
- Youth Support Services – as they have legal responsibilities in regard to the education and training of 13-19 year-olds
- other education organisations and exam boards – where this is necessary for the purposes of providing education
- suppliers and service providers – to enable them to provide the service for which they are contracted by us
- health and welfare organisations – to enable us to comply with our statutory duties in regard to care and safeguarding, including
    - therapists and/or clinical psychologists
    - medical or counselling staff within the academy
    - CAMHS (Children and Adolescent Mental Health Services)
    - social care
    - education welfare officers (EWOs).
- police forces, courts or tribunals – in order to uphold law and order.

Department for Education (DfE)

We are required to provide information about you to the DfE as part of data collections such as the School Census. To find out more about the information we are required to share please go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

Some of this information is then stored in the National Pupil Database, which is managed by the DfE and provides information on how schools are performing. The data is held electronically so that it can be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

The DfE 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 regarding how they use your data.

For more information about the DfE's data sharing process, please visit https://www.gov.uk/data-protection-how-we-collect-and-share-research-data.

To contact DfE please visit https://www.gov.uk/contact-dfe.

Youth Support Services

Once you reach the age of 13 we are legally required to pass on certain information about you to the local authority or youth support services provider in your area as it has legal responsibilities regarding the education and training of 13 to 19 year-olds. This information enables it to provide youth support services, post-16 education and training services and careers advice.

If you (once you are 16 or over) or your parent/carer do not wish this information to be passed on, you can contact us to tell us that you do not wish this information to be shared. You can do this by contacting the DPL at your academy.

Transferring data internationally

If we need to share information about you with an organisation that is based outside the European Economic Area (EEA), we will protect your data by following data protection law. In practice, this would only happen if one of your parents lives abroad, or if you move to a school outside the EEA. If this happens, we will take extra steps to ensure that we can transfer your data securely. We will, for example, look at whether or not the country in question has good data protection laws. If we cannot be sure, then we will talk to you and/or your parent/carer to make sure you are happy for us to transfer the information.

We will always tell you if we feel we have a need to transfer any information about you internationally.

Photographs and media

We may take photographs of you during the course of normal academy activities. We will always make you aware when this is happening and tell you the reason why photographs are being taken.

In most cases, we will only use the photographs for purposes related to your education, such as the compilation of class lists, or your identification on items such as security passes. In such cases, there is a clear lawful basis for doing so in pursuit of the public interest and providing you with an education.

We may also use the photographs (without your name attached) in materials for our website, for prospectuses or for schools displays. If you and/or your parent/carer do not wish your photographs to be used for this purpose, you will have the opportunity to tell us this when you join the academy. You can change your mind about this at any point by contacting the DPL in your academy.

If we want to use the photographs for any other reason we will make sure you know the reason why and seek your permission to do so.

Many of our academies operate CCTV systems – you can find more information about how we use these in the 'CCTV' section of our *Data protection policy*.

Biometric data

In some of our academies, we use biometric data in automatic systems relating to security. All such data will be processed in accordance with the General Data Protection Regulation and the Protection of Freedoms Act 2012. We will only use your biometric information if we have the written consent of one or more of your parents/carers.

Your rights

We only keep your information for as long as we need to or for as long as the law requires us to. Most of the information we have about you will be in your pupil file. We usually keep these until your 25th birthday unless you move to another school, in which case we send your file to your new school. You can find out more about how long we keep information in the 'retention and destruction of data' section of our *Data protection policy*.

You have other rights in relation to your personal data:

- You can ask us for a copy of the information we have about you by making a 'subject access request' via the DPL in your academy
- You can ask us to correct any information we have about you if you think it is wrong
- You can ask us to erase information about you (although there may be a good reason why we cannot always do this)
- You can ask us to limit what we do with your information (again, we may not always be able to agree to limit what we do if there is a legal reason why we cannot)
- You can object to what we are doing with your information
- You can ask us to transfer your information to another organisation in a format that makes it easy for them to use.

You can find out more information about these rights in our *Data protection policy* or by asking your DPL.

Contact and complaints

You can contact the Trust DPO by emailing DPO@academytransformation.co.uk.

If you have a complaint about how we are handling your personal data, you should address it using our complaints policy. Address your concern in the first instance to the DPL at your academy, or to the DPO at the address above.

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

- www.ico.org.uk/concerns
- Call 0303 123 1113
- Write to the Information Commissioner's Office, Wycliffe House, Water Lane, WILMSLOW SK9 5AF.

4 Privacy notice for parents/carers

Introduction

Under data protection law you have a right to be informed about how we use any personal data that is held about you. This **privacy notice** is designed to provide you with that information and to make sure that we, Academy Transformation Trust and our academies, are complying with the law.

Data controller and data processors

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Your academy, along with some authorised third party organisations (such as ParentPay) collect, process and 'use' data on our behalf and are therefore **data processors**.

The postal address of Academy Transformation Trust is Unit 4 Emmanuel Court, Reddicroft, Sutton Coldfield B73 6AZ.

If you want to contact us about your personal information you can contact the Data Protection Lead within the academy. You can speak to them in school or you can leave a letter at reception or send one by post.

The Trust's Data Protection Officer is Andy Gannon, who can be contacted at DPO@academytransformation.co.uk.

We will ensure that your personal data is processes fairly and lawfully, is accurate, is kept secure and is stored for no longer than necessary.

The categories of personal data we hold

We hold information about you to make sure that we can help your child to learn and keep them safe while they are at school. We may also hold information about you in order to enable the smooth functioning of academy administrative systems. For the same reasons, we also get information about you from some other places, such as other schools, professional bodies or the courts.

We hold information including

- personal information – your name, address and contact details and relationship or marriage status
- financial details – such as bank or credit card details or eligibility for free school meals
- information from social services – relating to safeguarding, usually, or care status
- details of your relationship with your child – which may include details relating to court orders
- other information, including photographs, images on CCTV and biometric data (in some cases).

We may also use special categories of data such as gender, age, ethnicity, sex or sexual orientation, religious or similar beliefs, information about health conditions, genetic information and biometric data. This information is subject to additional requirements.

Why we use this data

We use this data

- where required to by law, including

    - to provide reports and other information required by law in relation to the performance of your child
    - to raise or address any concerns about safeguarding to other government agencies including the police
    - to obtain relevant funding for the school
    - to provide or obtain additional services which may include services or support for your family
- where the law otherwise allows us to in order to carry out a task in the public interest, including
    - to confirm your identity
    - to communicate matters relating to the academy to you
    - to safeguarding you, our pupils and others
    - to enable payments to be made by you to the academy
    - to ensure the safety of individuals on our sites
    - to aid in the prevention and detection of crime
- where we otherwise have your consent to do so – while the majority of our processing of personal data does not require your consent, we will inform you if your consent is required and seek that consent before any processing takes place; we will also inform you of the consequences of your not giving consent.

We may process special category personal data in relation to you

- where the processing is necessary for reasons of substantial public interest, including for the purposes of equality of opportunity and treatment
- where the processing is necessary in order to ensure your health and safety while on site, including making any reasonable adjustments in respect of disabilities
- where we otherwise have your explicit consent in writing.

There may also be circumstances where we need to use your information in relation to legal claims or to protect your vital interests or those of your child. In these cases, it will not always be possible to seek your consent.

Our lawful basis for using this data

We will only collect and use your information where the law allows us to. Most often we will use your information where

- we need to in order to comply with the law
- we need to use it to carry out a task in the public interest (this includes providing your child with an education).

Sometimes we will also use your personal information where

- you have given us permission (known as consent) to use it in a particular way
- we need to protect your (or someone else's) health interests.

If we ask for permission from you to use information, you can withdraw this permission at any time. We will make this clear when we ask for permission and tell you how to go about withdrawing it.

Some of our reasons for using data overlap, and there may be several reasons that justify our use of your data.

How we store the data

We will keep personal information about you while your child is a student at one of our academies. We may also keep it after they have left where we are required to by law.

You can find out how long we will keep your information in the 'retention and destruction of data' section of our *Data protection policy*.

We may keep information about you in a variety of formats, including on paper, electronically or in the form of video or audio recordings.

Data sharing

We will not share personal information about you with any third party without your permission unless the law and our policies allow us to.

Where it is legally required, or necessary for another reason under data protection law, we may share personal information about you with

- the local authority – to meet our legal obligations in regard to areas such as safeguarding
- the Department for Education – to meet our legal obligations in regard to areas such as the School Census
- suppliers and service providers – to enable them to provide the service for which they are contracted by us
- health and welfare organisations – to enable us to comply with our statutory duties in regard to care and safeguarding, including
    - therapists and/or clinical psychologists
    - medical or counselling staff within the academy
    - CAMHS (Children and Adolescent Mental Health Services)
    - social care
    - education welfare officers (EWOs).
- police forces, courts or tribunals – in order to uphold law and order.

Your rights

We only keep your information for as long as we need to or for as long as the law requires us to. You can find out more about how long we keep information in the 'retention and destruction of data' section of our *Data protection policy*.

You have other rights in relation to your personal data:

- You can ask us for a copy of the information we have about you by making a 'subject access request' via the DPL in your academy
- You can ask us to correct any information we have about you if you think it is wrong
- You can ask us to erase information about you (although there may be a good reason why we cannot always do this)
- You can ask us to limit what we do with your information (again, we may not always be able to agree to limit what we do if there is a legal reason why we cannot)
- You can object to what we are doing with your information

- You can ask us to transfer your information to another organisation in a format that makes it easy for them to use.

You can find out more information about these rights in our *Data protection policy* or by asking your DPL.

Contact and complaints

You can contact the Trust DPO by emailing DPO@academytransformation.co.uk.

If you have a complaint about how we are handling your personal data, you should address it using our complaints policy. Address your concern in the first instance to the DPL at your academy, or to the DPO at the address above.

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

- www.ico.org.uk/concerns
- Call 0303 123 1113
- Write to the Information Commissioner's Office, Wycliffe House, Water Lane, WILMSLOW SK9 5AF.

5 Privacy notice for staff

Introduction

Under data protection law you have a right to be informed about how we use any personal data that is held about you. This **privacy notice** is designed to provide you with that information and to make sure that we, Academy Transformation Trust and our academies, are complying with the law.

Data controller and data processors

Academy Transformation Trust is the **data controller** for the purposes of data protection law. We are therefore the organisation in charge of how your personal information is collected and used.

Your academy, along with some authorised third party organisations collect, process and 'use' data on our behalf and are therefore **data processors**.

The postal address of Academy Transformation Trust is Unit 4 Emmanuel Court, Reddicroft, Sutton Coldfield B73 6AZ.

If you want to contact us about your personal information you can contact the Data Protection Lead within the academy. You can speak to them in school or you can leave a letter at reception or send one by post.

The Trust's Data Protection Officer is Andy Gannon, who can be contacted at DPO@academytransformation.co.uk.

We will ensure that your personal data is processed fairly and lawfully, is accurate, is kept secure and is stored for no longer than necessary.

The categories of personal data we hold

We hold information about you to make sure that we can fulfil our legal obligations as an employer and enable education to take place. We may also hold information about you in order to enable the smooth functioning of academy administrative systems. For the same reasons, we also get information about you from some other places, such as previous employers or professional bodies.

We hold information including

- personal information (such as name, address, home and mobile numbers, personal email address, employee or teacher number, national insurance number, and emergency contact details)
- contract information (such as start dates, hours worked, post, roles and salary information, bank/building society details)
- work absence information (such as number of absences and reasons (including information regarding physical and/or mental health), holiday records)
- qualifications / training courses attended and, where relevant, subjects taught (such as training record)
- performance information (such as appraisals and performance reviews, performance measures including performance management/improvement plans, disciplinary or grievance records)
- other information (such as pension arrangements (and all information included in these necessary to administer them), time and attendance records, information in applications made for other posts within the school, criminal records information (including the results of Disclosure and Barring Service (DBS) checks), details in references the school receives or provides to other organisations, CCTV footage and images).

We may also use special categories of data such as gender, age, ethnicity, sex or sexual orientation, religious or similar beliefs, information about health conditions, genetic information and biometric data. This information is subject to additional requirements.

Why we use this data

We will process your personal data

- Where we are required by law, including
    - to comply with the law regarding data sharing (see further below)
    - to comply with specific employment law requirements, including our obligations as an employer under employment protection and health and safety legislation, and under statutory codes of practice such as those issued by ACAS
    - to comply with legal requirements in relation to equalities and non-discrimination.
- where we are required by any contract with our workforce, such as employment contracts, including
    - to make payments to our workforce, such as salary payments
    - to deduct tax and National Insurance contributions
    - to make a decision about recruitment
    - to check individuals are legally entitled to work in the UK
    - to administer employment contracts
    - to conduct performance reviews
    - to make decisions about salary and remuneration
    - to liaise with pension providers
    - to provide some additional employment benefits
- where the law otherwise allows us to process the personal data, or we are carrying out a task in the public interest, including
    - to enable the development of a comprehensive picture of the workforce and how it is deployed
    - to inform the development of recruitment and retention policies
    - to safeguard our pupils and other individuals
    - to ensure safe working practices
    - in the interests of ensuring equal opportunities and treatment
- where we otherwise have your consent.

We may process special category personal data in relation to you

- where the processing is necessary for us to carry out our legal obligations in regard to employment law
- where the processing is necessary for reasons of substantial public interest, including for the purposes of equality of opportunity and treatment

- for the purposes of preventative or occupational medicine in order to assess your working capacity and/or your need for reasonable adjustments
- where we otherwise have your explicit consent in writing.

Whilst the majority of processing of your personal data will not require consent, we will inform you if your consent is required and seek that consent before any processing takes place.

Our lawful basis for using this data

We will only collect and use your information where the law allows us to. Most often we will use your information where

- we need to in order to comply with the law
- we need to use it to carry out a task in the public interest (this includes providing education).

Sometimes we will also use your personal information where

- you have given us permission (known as consent) to use it in a particular way
- we need to protect your (or someone else's) health interests.

If we ask for permission from you to use information, you can withdraw this permission at any time. We will make this clear when we ask for permission and tell you how to go about withdrawing it.

Some of our reasons for using data overlap, and there may be several reasons that justify our use of your data.

If we are unable to process the information described here, it may result in our being unable to perform our obligations under an employment contract or in our being prevented from complying with legal obligations.

Collecting the information

In most cases, you will provide the data we use. Sometimes, you can choose whether or not to give it to us.

We may also get information from tax and regulatory authorities such as HMRC, previous employers, your trades union, the DBS, our insurance benefit administrators, consultants, other professionals, recruitment or vetting agencies, other members of staff students or their parents/carers and publicly available resources including online sources and social media.

We may also obtain information through the monitoring of technical systems, including our websites, computer networks and systems, CCTV and access control systems, communications and remote access systems, email and instant messaging systems and internet and telephone facilities including voicemail and mobile phone records.

How we store the data

We will keep personal information about you while you are employed by one of our academies. We will also keep it after you have left where we are required to by law.

You can find out how long we will keep your information in the 'retention and destruction of data' section of our *Data protection policy*.

We may keep information about you in a variety of formats, including on paper, electronically or in the form of video or audio recordings.

Data sharing

We will not share personal information about you with any third party without your permission unless the law and our policies allow us to.

Where it is legally required, or necessary for another reason under data protection law, we may share personal information about you with

- the Department for Education – to meet our legal obligations in regard to areas such as statutory workforce-related data collections
- suppliers and service providers – such as payroll providers, to enable them to provide the service for which they are contracted by us
- professional advisers including legal and HR consultants
- pension scheme administrators
- police forces, courts or tribunals – in order to uphold law and order.

Department for Education (DfE)

We are required to provide information about you to the DfE as part of data collections. To find out more about the information we are required to share please go to https://www.gov.uk/data-protection-how-we-collect-and-share-research-data.

To contact DfE please visit https://www.gov.uk/contact-dfe.

Your rights

We only keep your information for as long as we need to or for as long as the law requires us to. You can find out more about how long we keep information in the 'retention and destruction of data' section of our *Data protection policy*.

You have other rights in relation to your personal data:

- You can ask us for a copy of the information we have about you by making a 'subject access request' via the DPL in your academy
- You can ask us to correct any information we have about you if you think it is wrong
- You can ask us to erase information about you (although there may be a good reason why we cannot always do this)
- You can ask us to limit what we do with your information (again, we may not always be able to agree to limit what we do if there is a legal reason why we cannot)
- You can object to what we are doing with your information
- You can ask us to transfer your information to another organisation in a format that makes it easy for them to use.

You can find out more information about these rights in our *Data protection policy* or by asking your DPL.

Contact and complaints

You can contact the Trust DPO by emailing DPO@academytransformation.co.uk.

If you have a complaint about how we are handling your personal data, you should address it using our complaints policy. Address your concern in the first instance to the DPL at your academy, or to the DPO at the address above.

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

- www.ico.org.uk/concerns
- Call 0303 123 1113
- Write to the Information Commissioner's Office, Wycliffe House, Water Lane, WILMSLOW SK9 5AF.

6 Privacy notice for visitors/commercial users of the site

Introduction

Under data protection law you have a right to be informed about how we use any personal data that is held about you. This **privacy notice** is designed to provide you with that information and to make sure that we, Academy Transformation Trust and our academies, are complying with the law.

Data controller and data processors

Academy Transformation Trust is the **data controller** for the purposes of data protection law. We are therefore the organisation in charge of how your personal information is collected and used.

Your academy, along with some authorised third party organisations (such as ParentPay) collect, process and 'use' data on our behalf and are therefore **data processors**.

The postal address of Academy Transformation Trust is Unit 4 Emmanuel Court, Reddicroft, Sutton Coldfield B73 6AZ.

If you want to contact us about your personal information you can contact the Data Protection Lead within the academy. You can speak to them in school or you can leave a letter at reception or send one by post.

The Trust's Data Protection Officer is Andy Gannon, who can be contacted at DPO@academytransformation.co.uk.

We will ensure that your personal data is processes fairly and lawfully, is accurate, is kept secure and is stored for no longer than necessary.

The categories of personal data we hold

We hold information about you to make sure that we can provide you with services and ensure you are safe while on site.

We hold information including

- personal information – your name, address and contact details
- financial details – such as bank or credit card details
- details, where relevant, about training or qualifications and insurance for using our premises
- criminal records information, if relevant, including DBS checks for volunteers
- other information, including photographs, images on CCTV and biometric data (in some cases).

We may also use special categories of data such as gender, age, ethnicity, sex or sexual orientation, religious or similar beliefs, information about health conditions, genetic information and biometric data. This information is subject to additional requirements.

Why we use this data

We use this data

- where required to by law, including
    - to check your eligibility where appropriate
    - to comply with legal and statutory requirements
    - to safeguard users of our services
- where the law otherwise allows us to in order to carry out a task for contractual, legal or legitimate business interest reasons, including

    - to confirm your identity
    - to provide you with any services that you have purchased or received
    - to notify you if we will be unable to provide a service you have booked before
    - for research and analysis so we can develop and improve our services for your benefit
- where we otherwise have your consent to do so – including to provide marketing communications and to tailor our communications to you to ensure relevance.

We may process special category personal data in relation to you

- where the processing is necessary for reasons of substantial public interest, including for the purposes of equality of opportunity and treatment
- where the processing is necessary in order to ensure your health and safety while on site, including making any reasonable adjustments in respect of disabilities
- where we otherwise have your explicit consent in writing.

There may also be circumstances where we need to use your information in relation to legal claims or to protect your vital interests. In these cases, it will not always be possible to seek your consent.

Our lawful basis for using this data

We will only collect and use your information where the law allows us to. Most often we will use your information where

- we need to in order to comply with the law
- we need to use it to carry out a task in the public interest (this includes providing your child with an education).

Sometimes we will also use your personal information where

- you have given us permission (known as consent) to use it in a particular way
- we need to protect your (or someone else's) health interests.

If we ask for permission from you to use information, you can withdraw this permission at any time. We will make this clear when we ask for permission and tell you how to go about withdrawing it.

Some of our reasons for using data overlap, and there may be several reasons that justify our use of your data.

If you fail to provide information to us we may be prevented from complying with our legal and/or statutory obligations. In some cases, we will not be able to provide these services/facilities in the absence of the data.

How we store the data

We will hold information as long as necessary. We retain personal information as long as we consider it useful to contact you, or as needed to comply with our legal/statutory obligations. When data is no longer needed, we will promptly and securely destroy it.

If CCTV footage is being stored in the event of an incident, we may retain it until any investigations are concluded.

You can find out how long we will keep your information in the 'retention and destruction of data' section of our *Data protection policy*.

We may keep information about you in a variety of formats, including on paper, electronically or in the form of video or audio recordings.

Data sharing

We will not share your data outside our Trust, unless you have provided explicit written consent.

The only exception to this might be where we have to fulfil specific legal duties, such as

- communicating with government agencies in regard to auditing functions
- communicating with health or emergency services in the event of an accident or incident on site.

Services provided by other third parties (commercial users only)

Sometimes third parties will use our facilities for delivering their own services. Where this takes place the third party will remain the controller of the data for the services that they provide. The data will not enter our database unless the individual that takes part in these services also provides us with their personal data directly or has provided this information to us previously.

For these services the third party will be responsible for upholding and responding to the rights of individuals. You should check to make sure you understand their approach to data protection.

Communicating with you (commercial users only)

There are certain communications we need to send to you so we can provide our services. We call these service communications and include service/booking related updates and financial correspondence. We would not be able to provide you with services if we did not send these communications.

If you enter into a fixed period booking/service with a specific end or renewal date, we will contact you at the appropriate time to remind you that your service is coming to an and end and how you can renew/extend it.

Your rights

We only keep your information for as long as we need to or for as long as the law requires us to. You can find out more about how long we keep information in the 'retention and destruction of data' section of our *Data protection policy*.

You have other rights in relation to your personal data:

- You can ask us for a copy of the information we have about you by making a 'subject access request' via the DPL in your academy
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- You can ask us to erase information about you (although there may be a good reason why we cannot always do this)
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