

# Privacy Policy

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# 1. The Purpose of a Privacy Notice

The Data Protection Act (2018) sets out in UK law the legal framework with which education settings must comply when they process personal data.

Providing accessible information to individuals about the use of their personal information (data) is a key element of their legal right to transparency as set out in the UK General Data Protection Regulation (UK GDPR).

Data Controllers and Data Processors are responsible for providing this information. All education settings are classed as data controllers and may also be data processors in their own right and, as such, they have a duty to inform pupils, staff and parents (known as Data Subjects) on how they process the data that is within their control.

## 2. Definitions

- **Data controller** - The organisation which (either alone or in common with other people) determines the purpose for which, and the way in which data are processed.
- **Data Processor** - A person or organisation processing data on behalf of, and on the orders of, a controller
- **Data Subject** – the person about whom you are processing data.
- **Data Protection Officer/Lead (DPO/DPL)** – an officer of the School / Trust who is responsible for data protection issues within the School / Trust.
- **Personal Data** - any information which, on its own or in conjunction with other information available to a data controller, can identify a data subject.

Some personal data is classed as being part of a special category and, if you control or process special category data, you need an additional reason to process the data. UK GDPR specifically defines 'special category' as data relating to:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade-union membership
- health or sex life
- data relating to criminal offences is also afforded similar special protection.



For the purposes of data protection legislation, the terms 'process', 'processed' or 'processing' apply to any activity involving the personal data, such as:

- collecting
- storing
- sharing
- destroying

## 3. Privacy Notice

The Trust's Privacy Notice will contain the following sections:

- who the Data Controller and Data Processors are
- the categories of data collected / processed
- why the data is collected (purpose)
- how the data is used (processed)
- the lawful basis for processing the data
- how and where the data is stored, how long for, and how security is ensured
- who / which organisations data is shared with and why
- what those organisations will do with the data
- the individual's rights over their data (including right of access) and how they can exercise them
- contact details for the data protection lead (for queries)
- contact details for the Information Commissioner's Office in the event the data subject wishes to make a complaint

## 4. Categories of Information Processed

Our Schools and Trust will process many individual data items for our pupils and / or staff members. Under UK GDPR, we are expected to be transparent about which of the categories of information that we process. Individual data items can be extremely detailed and are unlikely to be used in isolation. We will therefore aim to group data items together into data item groups and / or group into overarching themes. The most workable groups identified include:

- admissions
- attainment
- attendance
- behaviour
- exclusions
- personal identifiers, contacts and pupil characteristics
- identity management/authentication



## 5. Why Personal Data is collected

As an educational organisation we will need to collect individual pupil / staff data for several reasons. This is contained in our Privacy Notices. Our Privacy Notices will include the purpose of the processing as well as the lawful basis for processing.

## 6. Managing Personal Data

### Collecting Personal Data

The Trust's Privacy Notice will explain how we collect information regarding our children/pupils/learners and staff members. For example:

- registration forms
- medication forms
- Common Transfer Files from previous schools
- Staff contract information
- Child protection plans

The School / Trust will make it clear whether data collected is:

- Mandatory
- Voluntary
- Essential for operational use such as parental contact information

### Storing Personal Data

To comply with data protection legislation, we have defined our individual data retention and data security policies. Some data may need to be kept for a minimum period for legal purposes.

### Who Data is Shared with

We will list instances of routine data sharing. This is data shared on a regular basis. Instances of one-off transfers or ad-hoc requests will not be listed, although we will only do so where there is a lawful reason to share data.

### Why is Data Shared

We will explain why we routinely share information with a list of the named recipients, list the reasons for sharing and the relevant legislation that allows the sharing of the data. As a Trust of Schools, we are the data



controllers and will decide whether to share personal data with other organisations. We will only share personal data with other organisations where there is a clear business need, relevant lawful reason and where Data Protection Officers are in support of the data sharing. We will also include information on how the data is transferred.

## 7. Requesting access to personal data and contact information

Under data protection legislation, parents, pupils and staff have the right to request access to information about them that we hold. They may also have a right (depending on lawful basis) to object to:

- processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purposes of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- A right to seek redress, either through the ICO, or through the courts

Requests for information from Schools should be requested from the Schools Data Protection Lead (DPL)

Darwen Aldridge Community Academy	<a href="mailto:dpl@daca.uk.com">dpl@daca.uk.com</a>
Darwen Vale High School	<a href="mailto:dpl@darwenvale.com">dpl@darwenvale.com</a>
Darwen Aldridge Enterprise School	<a href="mailto:dpl@daestudio.biz">dpl@daestudio.biz</a>
Sudell Primary School	<a href="mailto:dpl@sudell.blackburn.sch.uk">dpl@sudell.blackburn.sch.uk</a>
Aldridge UTC@MediaCityUK	<a href="mailto:dpl@utcmedicityuk.org.uk">dpl@utcmedicityuk.org.uk</a>
Dukes Aldridge Academy	<a href="mailto:dpl@dukesacademy.org.uk">dpl@dukesacademy.org.uk</a>
Brighton Aldridge Community Academy	<a href="mailto:dpl@baca-uk.co.uk">dpl@baca-uk.co.uk</a>
Portslade Aldridge Community Academy	<a href="mailto:dpl@paca.uk.com">dpl@paca.uk.com</a>
Aldridge Adult Learning	<a href="mailto:dpl@aal.org.uk">dpl@aal.org.uk</a>

Requests for information from the Trust should be requested from the Trust's Data Protection Officer (DPO).

Aldridge Education	<a href="mailto:dpo@aldridgeeducation.org">dpo@aldridgeeducation.org</a>
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