Ormiston Academies Trust

# Data protection privacy notices

## Policy version control

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# Appendix 1

## Employees Privacy Notice – Statutory

This privacy notice has been written to inform current and former employees of Ormiston Academies Trust (OAT) about how and why we process their personal data.

## Who are we?

Ormiston Academies Trust is a 'Data Controller' as defined by Article 4 (7) of GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The Trust has appointed Alexandra Coughlan to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the Trust is compliant with GDPR and to oversee data protection procedures. The contact details are:

dpo@ormistonacademies.co.uk

Unit G.05B
Assay Studios
141 Newhall Street
Birmingham
B3 1SF

*Please ensure you include the name of the school in all correspondence with the DPO where appropriate.

## What information do we collect and why do we require it?

The personal data we collect about you includes:

- Personal identifiers (your name, address, date of birth, National Insurance number etc., photograph - for ID purposes);
- Previous job experience and qualifications (including copies of certificates and employment references);
- Information about your ethnicity, disability, religious beliefs and sexual orientation (for the purposes of equality and diversity monitoring);
- Information about any criminal convictions you have;
- Where relevant, information about prohibition from teaching in the UK or European Economic Area;
- Where relevant, information about you and members of your household in relation to
- disqualification from providing childcare under the Childcare Act 2006;
- Information about your right to work in the UK;
- Information about your employment attendance, conduct and performance (including sickness, disciplinary and appraisal information);
- Relevant medical information which affects your employment;
- Emergency contact information of those individuals you identify; and

- Financial information including bank account information, tax, national insurance, pension contributions, trade union subscriptions, student loans and court orders etc. to facilitate salary payments.

On occasion the trust may conduct an investigation under its HR procedures, such as disciplinary or grievance matters. Information collected for the above could comprise, but not be limited to: notes of investigatory interviews, witness statements, relevant correspondence (e.g. emails to/from your work account), social media accounts, CCTV, IT audit trials.

## Who do we obtain your information from?

Much of the information we process will be obtained directly from you. We will also process information received from:

- Department for Education (DfE)
- Relevant local authorities
- Previous employers
- National Health Service bodies

## Who do we share your personal data with?

Your information will only be made available to those who need it to perform the functions of their office or do their job in relation to your employment. This includes your line manager(s) and relevant administrative staff. On occasions when the trust has conducted an investigation under its HR procedures, it may share this information with parties who are involved in hearing or considering an appeal about a case, including those providing advice to the hearing or appeal, and any trade union representative or work colleague that you choose to accompany you.

Your name, job title, work email address, telephone number and office base will be available in our internal telephone directory which is accessible to all trust staff. Your name, work email address and office base will be available on an email address list which is accessible to all trust staff.

We will share your information with the following organisations:

- HM Revenues and Customs
- Department for Work and Pensions, if applicable
- East Riding Pension Fund, if you are a member of the Local Government Pension Scheme
- Teachers' Pensions, if you are a member of the Teachers' Pension Scheme
- Any salary sacrifice arrangement you sign up to
- Your trade union, if applicable
- Examining bodies, if applicable
- The provider of HR advisory, HR transactional, Payroll, Occupational Health and Health and Safety services to the trust
- Disclosure and Barring Service to conduct criminal record checks
- Prospective future employers, landlords, letting agents, or mortgage brokers where you have asked them to contact us to seek a reference
- Insurance providers
- Department for Education for the purposes of the School Workforce Census

- Ofsted if they wish to inspect the single, central record of recruitment and vetting checks and related documentary evidence held by the trust.

The trust's internal and external auditors, health and safety advisers and data protection officer may also have access to your personal data in order to complete their work.

## Do you transfer my data outside of the UK?

Generally, the information that the school holds is all held within the UK. However, some information may be held on computer servers which are held outside of the UK. We will take all reasonable steps to ensure your data is not processed in a country that is not seen as 'safe' by the UK government. If the trust does need to send your data out of the European Economic Area, it will ensure it has extra protection from loss or unauthorised access.

## How long do we keep your personal data for?

We will keep your data in line with our Records Retention Policy. Most of the information we process about you will be retained as determined by statutory obligations. Any personal information which we are not required by law to retain will only be kept for as long as is necessary to fulfil our organisational needs.

## What is our lawful basis for processing your personal data?

The trust is required to process your personal data and your special category data to take necessary steps to enter an employment contract. The trust is also legally required to collect some information as defined by employment law.

As such the Trust relies on Article 6(1)(b) and Article 9(2)(b) of the GDPR to process your personal and special category data. This is in pursuance with Schedule 1, Part 1 (1)(1)(a) of the Data Protection Act 2018 – this means that the Trust can process your data as part of the official authority vested in us by the above legislation.

**Photographs**

We will seek your consent to use your photo on the trust's or the school's website or in any publicity material we produce. Please note that you can withdraw this consent at any time.

**Health emergencies at work**

In the rare event of a health emergency at work, including mental health emergencies, we will share your personal data with relevant external bodies, such as emergency services. We may also share information with your next of kin or emergency contact.

## What rights do you have over your data?

Under UK GDPR, individuals have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation
- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted

- to object to your personal data being processed

You can exercise any of these rights by contacting: dpo@ormistonacademies.co.uk.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the Trust has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow Cheshire
SK9 5AF

casework@ico.org.uk | 0303 123 1113

# Appendix 2

## Pupil and Parent/Carer Privacy Notice – Statutory

This privacy notice has been written to inform parents/carers and pupils of Ormiston Academies Trust (OAT) about how and why we process their personal data.

## Who are we?

Ormiston Academies Trust is a 'Data Controller' as defined by Article 4 (7) of GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The Trust has appointed Alexandra Coughlan to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the Trust is compliant with GDPR and to oversee data protection procedures. The contact details are:

dpo@ormistonacademies.co.uk

Unit G.05B
Assay Studios
141 Newhall Street
Birmingham
B3 1SF

*Please ensure you include the name of the school in all correspondence with the DPO where appropriate.

## What information do we collect and why do we require it?

The categories of information that we collect, hold and share include the following:

- personal information of pupils and their family members e.g. name, pupil number, date of birth and address
- educational achievement
- free school meal eligibility
- attendance information
- assessment information
- behavioural information
- safeguarding information

We will also process certain 'special category' data about our pupils including:

- relevant medical information - please note that where the pupil has a severe allergy or is thought to be at risk of needing emergency care for a medical issue then this will be shared with all the staff. We may do this in the form of photo identification in the staff room to ensure that all staff are aware of the issues should an emergency situation arise
- if they are looked after by their local authority
- Special Educational Needs and Disabilities information

- race, ethnicity and religion
- at relevant schools, biometric data e.g. digital finger scans.

The trust will ensure that this data has extra protection to ensure against accidental loss or destruction.

We use the information we collect:

- to support pupil learning
- to monitor and report on pupil achievement
- to provide appropriate pastoral and welfare care
- to assess the quality of our services

## Who do we obtain your information from?

Much of the information we process will be obtained directly from you (pupils and parents/ carers). We will also process information received from:

- Department for Education (DfE)
- local authorities
- previous schools attended
- National Health Service bodies
- private fostering agencies.

## Who do we share your personal data with?

Your name, contact details, and address will be held at individual school level so that we can contact you and also easily identify you should you contact us. Employees of the trust may only access your personal data if they require it to perform a task. There are procedures and checks in place to ensure that employees do not use your data for their own personal benefit. Only employees of the school which you or your child attends will have routine access to your information. On some occasions attendance and family support services and “back office” functions, such as administration, may be shared across the trust in order to provide a more efficient service to you in which case other employees in the trust may have limited access to your personal information. Our appointed governors and directors/trustees may also require your personal data for the governing of the school and trust. Personal data will only be disclosed to these individuals if there is a legitimate governing purpose to do so.

Third Party Processors - In order to deliver the best possible service, the trust often uses third party organisations. These organisations will sometimes require access to your personal data in order to complete their work. If the trust does use a third party organisation it will always have an agreement in place to ensure that the other organisation keeps your data secure and only uses it for the agreed purpose(s).

Other Organisations - Occasionally the Trust is required to pass your data to other organisations. This could be because of a legal requirement or because a court orders the trust to do so. For example, the trust may need to share information with the police to help prevent or detect a crime. The trust may not have to tell you if we do share with other organisations.

We routinely share pupil information with:

- Department for Education (DfE)
- local authorities
- schools that pupils attend after leaving us
- National Health Service bodies
- if relevant, exam boards and testing agencies

For more information on information sharing with the DfE (including the National Pupil Database and Census) please go to: https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information. We will not share any information about you outside the school without your consent unless we have a lawful basis for doing so.

Internal Compliance Functions - The trust's internal auditors, data protection officer, health and safety advisers, insurers and external auditors may also have access to your personal data in order to complete their work.

Secondary schools only: Once our pupils reach the age of 13, we also pass information to the local authority and/or provider of youth support services as stipulated under section 507B of the Education Act 1996. The information provided includes names and addresses of pupil and parents/carers, pupil date of birth and any other information necessary for the provision of the service including gender or ethnicity. A parent or guardian can request that only their child's name, address and date of birth is passed to their local authority or provider of youth support services by informing us. This right is transferred to the child/pupil once he/she reaches the age 16. For more information regarding services for young people please visit the relevant local authority's website.

## Do you transfer my data outside of the UK?

Generally, the information that the school holds is all held within the UK. However, some information may be held on computer servers which are held outside of the UK. We will take all reasonable steps to ensure your data is not processed in a country that is not seen as 'safe' by the UK government. If the trust does need to send your data out of the European Economic Area, it will ensure it has extra protection from loss or unauthorised access. If you or your child moves to a school outside of the European Economic Area, then the Trust will seek your explicit consent prior to transferring your personal information to that school.

## How long do we keep your personal data for?

We will keep your data in line with our Records Retention Policy. Most of the information we process about you will be retained as determined by statutory obligations. Any personal information which we are not required by law to retain will only be kept for as long as is necessary to fulfil our organisational needs.

## What is our lawful basis for processing your personal data?

Any personal data that we process about our pupils and parents is done so in accordance with Article 6 and Article 9 of GDPR:

Our legal basis for processing your personal data, in line with Article 6(1)(c) includes but is not limited to:

- Education Act 1944,1996,2002
- Education and Adoption Act 2016

- Education (Information About Individual Pupils) (England) Regulations 2013
- Education (Pupil Information) (England) Regulations 2005
- Education and Skills Act 2008
- Children Act 1989, 2004
- Children and Families Act 2014
- Equality Act 2010
- Education (Special Educational Needs) Regulations 2001
- The School Attendance (Pupil Registration) (England) Regulations 2024
- Working together to improve school attendance

We also process information in accordance with Article 6(e) and Article 9(2)(g) as part of the official authority vested in us as Data Controller and for reasons of substantial public interest. Such processing, which is not mandatory but is considered to be in our pupils' interests, includes:

- school trips
- before and after school provision
- extra-curricular activities

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. When we do process this additional information, we will ensure that we ask for your consent to process it.

## What rights do you have over your data?

Under UK GDPR, individuals have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation
- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed

You can exercise any of these rights by contacting: dpo@ormistonacademies.co.uk.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the Trust has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow Cheshire
SK9 5AF

casework@ico.org.uk | 0303 123 1113

# Appendix 3

## Members, Trustees and Governors Privacy Notice – Statutory

This privacy notice has been written to inform prospective, current, and former members, trustees and local governors of Ormiston Academies Trust (OAT), about how and why we process their personal data.

## Who are we?

Ormiston Academies Trust is a 'Data Controller' as defined by Article 4 (7) of GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The Trust has appointed Alexandra Coughlan to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the Trust is compliant with GDPR and to oversee data protection procedures. The contact details are:

dpo@ormistonacademies.co.uk

Unit G.05B
Assay Studios
141 Newhall Street
Birmingham
B3 1SF

*Please ensure you include the name of the school in all correspondence with the DPO where appropriate.

## What information do we collect and why do we require it?

We use this data to comply with the law, comply with the statutory requirements for recording governance within the Academies Trust Handbook, Funding Agreement, Articles of Association and Get Information About Schools on the DfE database, provide appropriate statutory advice and guidance, deliver advice, guidance, information and training.

The personal data we collect about you includes:

- Personal/professional identifiers i.e. your name, residential and/or professional address, contact details and, in the case of trustees National Insurance number, date and place of birth
- Personal information relating to your particular role (i.e. if you are a parent governor);
- Information relating to the history of your appointment;
- Business, pecuniary, personal and other material interests or potential/known conflicts;
- Information relevant to whether you are disqualified from acting as a company director/charitable company trustee or as a local governor;
- Information about any criminal convictions you have; and
- Details of your personal characteristics (including ethnicity, age and disability) for equality and diversity monitoring purposes.

We process your personal data and special category data based on our legal responsibilities to:

- Safeguard children we have responsibility for,

- Maintain adequate health and safety standards,
- Monitor equality and diversity in our academies.

## Who do we obtain your information from?

The information we collect about members/trustees/governors is usually collected directly from individual members/trustees/governors or prospective members/trustees/governors.

However, we may need to collect data about you from, but not necessarily limited to, the following organisations:

- Companies House
- Charity Commission
- GovernorHub
- Other academies within the Trust where appropriate.
- The Department for Education (DFE).
- Appropriate regulators i.e. Ofsted, Regional DfE Directors.

## Who do we share your personal data with?

Your information will only be made available to those who need it to perform the functions of their office or do their job in relation to your role as a member, trustee or local governor. This includes relevant administrative/governance staff.

We will share your information with the following organisations:

- Disclosure and Barring Service to conduct criminal record checks and, if you are engaged in regulated activity, to check the Children's Barred List
- Department for Education to maintain the Get Information about Schools (GIAS) database
- GovernorHub to provide access to governance documents, meeting papers, updates, advice and training materials/event links
- In the case of trustees only, Companies House. The trust's internal and external auditors, health and safety advisers, insurers, governance professionals (i.e. clerks) and data protection officer may also have access to your personal data in order to complete their work.

## Do you transfer my data outside of the UK?

Generally, the information that the trust holds is all held within the UK. However, some information may be held on computer servers which are held outside of the UK. We will take all reasonable steps to ensure your data is not processed in a country that is not seen as 'safe' by the UK government. If the trust does need to send your data out of the European Economic Area, it will ensure it has extra protection from loss or unauthorised access.

## How long do we keep your personal data for?

We will keep your data in line with our Records Retention Policy. Most of the information we process about you will be retained as determined by statutory obligations. Any personal information which we are not required by law to retain will only be kept for as long as is necessary to fulfil our organisational needs.

## What is our lawful basis for processing your personal data?

The Trust relies on Article 6(1)(c) of the UK GDPR to process your personal data and Article 9(2)(g) This is in pursuance with Schedule 1 condition 8 (Equality of opportunity or treatment) of the Data Protection Act 2018 to process your special category data.

## What rights do you have over your data?

Under UK GDPR, individuals have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation
- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed

You can exercise any of these rights by contacting: dpo@ormistonacademies.co.uk.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the Trust has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow Cheshire
SK9 5AF

casework@ico.org.uk | 0303 123 1113

# Appendix 4

## Admissions Privacy Notice – Mandatory

This privacy notice has been written to inform prospective parents/carers and pupils of Ormiston Academies Trust (OAT) about how and why we process their personal data.

## Who are we?

Ormiston Academies Trust is a 'Data Controller' as defined by Article 4 (7) of GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The Trust has appointed Alexandra Coughlan to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the Trust is compliant with GDPR and to oversee data protection procedures. The contact details are:

dpo@ormistonacademies.co.uk
Unit G.05B
Assay Studios
141 Newhall Street
Birmingham
B3 1SF

*Please ensure you include the name of the school in all correspondence with the DPO where appropriate.

## What information do we collect and why do we require it?

The categories of information that we collect, hold and share include the following:

Children's data:

- Names
- Date of birth
- Address
- UPN
- Name of school, pre-school, nursery (current and previous)
- School exclusion history
- School attendance history
- Details of period if a child was or is in care i.e. looked after by a local authority and entails of adoption or special guardianship orders and names of social workers involved
- Details of exceptional social and medical needs provided by parents to meet school admission oversubscription criteria, such as written statements from parents or supporting letter from professionals and a copy of your EHCP where applicable
- Details of support received in school from specialist services i.e. speech and language support
- Nationality and whether or not the child is seeking asylum or is a refugee and documentation to support this

Parent/carer data:

- Names
- Address
- Email
- Telephone number
- Date of birth
- Proof of residence (e.g. utilities bill, exchange of contracts confirmation letter, rental agreement)
- School preferences
- Reasons for your school preferences (optional)

We use the information we collect:

- To process your child's application for a school place
- To administer any school appeals that may be heard
- To prevent and detect fraudulent applications for school places
- To contact and notify parents/carers where they have queries about the application and to let them know the final outcome of the application
- To notify the allocated school and provide them with your child's details as detailed on the application form and your contact details
- To maintain waiting lists where parents are not allocated their preferred school or schools
- To help investigate any worries or complaints you may have about our service
- To develop and improve our services

## Who do we obtain your information from?

Much of the information we process will be obtained directly from you (pupils and parents/ carers). We will also process information received from:

- Department for Education (DfE)
- local authorities
- previous schools attended
- National Health Service bodies
- private fostering agencies.

## Who do we share your personal data with?

Your name, contact details, and address will be held at individual school level so that we can contact you and also easily identify you should you contact us. Employees of the trust may only access your personal data if they require it to perform a task. There are procedures and checks in place to ensure that employees do not use your data for their own personal benefit. Only employees of the school in which you or your child apply for a place will have routine access to your information. On some occasions attendance and family support services and "back office" functions, such as administration, may be shared across the trust in order to provide a more efficient service to you in which case other employees in the trust may have limited access to your personal information. Our appointed governors and directors/trustees may also require your personal data for the governing of the school and trust. Personal data will only be disclosed to these individuals if there is a legitimate governing purpose to do so.

Third Party Processors - In order to deliver the best possible service, the trust often uses third party organisations. These organisations will sometimes require access to your personal data in order to complete their work. If the trust does use a third party organisation it will always have an agreement in place to ensure that the other organisation keeps your data secure and only uses it for the agreed purpose(s).

For bulk admissions purposes (i.e. new starters in reception and new starters in year 7), this is likely to be carried out by the relevant local authority.

Other Organisations - Occasionally the Trust is required to pass your data to other organisations. This could be because of a legal requirement or because a court orders the trust to do so. For example, the trust may need to share information with the police to help prevent or detect a crime. The trust may not have to tell you if we do share with other organisations.

We routinely share pupil information with:

- Department for Education (DfE)
- local authorities
- schools that pupils attend after leaving us
- National Health Service bodies

For more information on information sharing with the DfE (including the National Pupil Database and Census) please go to: https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information. We will not share any information about you outside the school without your consent unless we have a lawful basis for doing so.

Internal Compliance Functions - The trust's internal auditors, data protection officer, health and safety advisers, insurers and external auditors may also have access to your personal data in order to complete their work.

## Do you transfer my data outside of the UK?

Generally, the information that the school holds is all held within the UK. However, some information may be held on computer servers which are held outside of the UK. We will take all reasonable steps to ensure your data is not processed in a country that is not seen as 'safe' by the UK government. If the trust does need to send your data out of the European Economic Area, it will ensure it has extra protection from loss or unauthorised access. If you or your child moves to a school outside of the European Economic Area, then the Trust will seek your explicit consent prior to transferring your personal information to that school.

## How long do we keep your personal data for?

We will keep your data in line with our Records Retention Policy. Most of the information we process about you will be retained as determined by statutory obligations. Any personal information which we are not required by law to retain will only be kept for as long as is necessary to fulfil our organisational needs.

## What is our lawful basis for processing your personal data?

Any personal data that we process about our prospective pupils and parents is done so in accordance with Article 6 and Article 9 of UK GDPR:

Our legal basis for processing your personal data, in line with Article 6(1)(c) includes but is not limited to:

- School Admissions Regulations 2012
- Education act 1996
- School Admissions Code 2014
- School Standards and Framework Act 1998

We also process information in accordance with Article 6(e) and Article 9(2)(g) as part of the official authority vested in us as Data Controller and for reasons of substantial public interest.

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. When we do process this additional information, we will ensure that we ask for your consent to process it.

## What rights do you have over your data?

Under UK GDPR, individuals have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation
- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed
- rights relating to automated decision making and profiling

You can exercise any of these rights by contacting: dpo@ormistonacademies.co.uk.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the Trust has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow Cheshire
SK9 5AF

casework@ico.org.uk | 0303 123 1113

# Appendix 5

## Complaints Privacy Notice – Mandatory

This Privacy Notice has been written to inform individuals who are contemplating making a complaint, are in the progress of making a complaint, or have previously made a complaint about what Ormiston Academies Trust does with your personal data as part of the Trust's complaints process.

## Who are we?

Ormiston Academies Trust is a 'Data Controller' as defined by Article 4 (7) of GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The Trust has appointed Alexandra Coughlan to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the Trust is compliant with GDPR and to oversee data protection procedures. The contact details are:

dpo@ormistonacademies.co.uk
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Assay Studios
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Birmingham
B3 1SF

*Please ensure you include the name of the school in all correspondence with the DPO where appropriate.

## What information do we collect and why do we require it?

As an Academy Trust we are obliged by law to have a complaints procedure in place. As part of our complaints procedure, we are required to process personal data.

The personal data we collect about you includes:

- Personal identifiers (your name, address, contact details) or those relating to your child
- Any relevant information we hold on School systems and databases,
- Any information you, or a party to the complaint, provides us with,
- Any information passed to us by any other organisation,
- Witness statements,
- Any relevant correspondence we have had with you or another party to the complaint – including internal correspondence about you,
- Any relevant video recording (including CCTV), audio recordings, or images,
- Investigation interview notes.

## Who do we obtain your information from?

Much of the information we process will be obtained directly from your complaint or from a complaint made by another individual. However, we may need to collect data about you from, but not necessarily limited to, the following organisations:

- Department of Education,
- The Local Authority,
- Our appointed Data Protection Officer
- Ofsted
- The Police and/or other Law Enforcement bodies
- Local Health and/or social care providers

## Who do we share your personal data with?

All complaints are handled in line with the complaints policy. As part of that we will disclose any relevant data to any individual that requires the data in order to complete the investigation, to administer the complaint, or to receive advice about how to handle a complaint. Usually these will be employees of the Trust but on occasion we use an independent external party to investigate formal complaints. We also share data with an independent panel member at stage 3 and the clerk may also be an independent person.

The following organisations may also receive your data if allowed by law:

- Department for Education
- The Local Authority
- Ofsted
- Information Commissioner's Office
- Our appointed solicitors
- Any other organisation and/or regulator when the Trust is legally required to disclose your information.

## Do you transfer my data outside of the UK?

Generally, the information that the school holds is all held within the UK. However, some information may be held on computer servers which are held outside of the UK. We will take all reasonable steps to ensure your data is not processed in a country that is not seen as 'safe' by the UK government. If the trust does need to send your data out of the European Economic Area, it will ensure it has extra protection from loss or unauthorised access. If you or your child moves to a school outside of the European Economic Area, then the Trust will seek your explicit consent prior to transferring your personal information to that school.

## How long do we keep your personal data for?

We will keep your data in line with our Records Retention Policy. Most of the information we process about you will be retained as determined by statutory obligations. Any personal information which we are not required by law to retain will only be kept for as long as is necessary to fulfil our organisational needs.

## What is our lawful basis for processing your personal data?

The trust is required to process yours and your child's personal data and special category data to take necessary steps to comply with our requirements around complaints.

As such the Trust relies on Article 6(1)(c) and Article 9(2)(g) of the GDPR to process your personal and special category data. This is in pursuance with Part 2 of Schedule 1 of the Data Protection Act 2018 – this means that the Trust can process your data as part of the official authority vested in us by the above legislation.

## What rights do you have over your data?

Under UK GDPR, individuals have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation
- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed

You can exercise any of these rights by contacting: dpo@ormistonacademies.co.uk.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the Trust has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow Cheshire
SK9 5AF

casework@ico.org.uk | 0303 123 1113

# Appendix 6

## Consultants Privacy Notice – Mandatory

This privacy notice has been written to inform consultants carrying out work on behalf of Ormiston Academies Trust (OAT) about how and why we process their personal data.

## Who are we?

Ormiston Academies Trust is a 'Data Controller' as defined by Article 4 (7) of GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The Trust has appointed Alexandra Coughlan to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the Trust is compliant with GDPR and to oversee data protection procedures. The contact details are:

dpo@ormistonacademies.co.uk
Unit G.05B
Assay Studios
141 Newhall Street
Birmingham
B3 1SF

## What information do we collect and why do we require it?

The categories of information that we collect, hold and share include the following:

- Name
- Email address
- Job title
- Work address
- Mobile phone number
- Disability information
- Education and skills
- Bank details
- DBS reference
- References
- Proof of right to work
- Consultancy contract
- Details and copies of required insurance

We use the information we collect to:

- Assess suitability to carry out work for OAT
- Determine eligibility to work in the UK

- To run IR35 assessments to determine whether you should be on or off our payroll and then to add to our payroll where necessary

## Who do we obtain your information from?

Much of the information we process will be obtained directly from you. We will also process information received from third parties that you have submitted tour personal data to and specifically given consent to allow them to pass this information to other bodies, such as ourselves, where there is a legitimate reason to do so.

## Who do we share your personal data with?

Other Organisations - Occasionally the Trust is required to pass your data to other organisations. This could be because of a legal requirement or because a court orders the trust to do so. The trust may not have to tell you if we do share with other organisations. This can include:

- Insurance companies, loss assessors, regulatory authorities and other fraud prevention agencies for the purposes of fraud prevention and to comply with any legal and regulatory issues and disclosures
- Any legal or crime prevention agencies and/or to satisfy a regulatory request if we have a duty to do so or the law allows us to do so

Internal Compliance Functions - The trust's internal auditors, data protection officer, health and safety advisers, insurers and external auditors may also have access to your personal data in order to complete their work.

## Do you transfer my data outside of the UK?

Generally, the information that the Trust holds is all held within the UK. However, some information may be held on computer servers which are held outside of the UK. We will take all reasonable steps to ensure your data is not processed in a country that is not seen as 'safe' by the UK government. If the Trust does need to send your data out of the European Economic Area, it will ensure it has extra protection from loss or unauthorised access.

## How long do we keep your personal data for?

We will keep your data in line with our Records Retention Policy. Most of the information we process about you will be retained as determined by statutory obligations. Any personal information which we are not required by law to retain will only be kept for as long as is necessary to fulfil our organisational needs.

## What is our lawful basis for processing your personal data?

Any personal data that we process about you is done so in accordance with Article 6 and Article 9 of UK GDPR:

Our legal basis for processing your personal data is Article 6(1)(b): the processing is necessary for a contract we have with you, or because we have asked you to take specific steps before entering into a contract

We also process information in accordance with Article 9(2)(g) as part of the official authority vested in us as Data Controller and for reasons of substantial public interest.

## What rights do you have over your data?

Under UK GDPR, individuals have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation
- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed
- rights relating to automated decision making and profiling

You can exercise any of these rights by contacting: dpo@ormistonacademies.co.uk.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the Trust has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow Cheshire
SK9 5AF

casework@ico.org.uk | 0303 123 1113

# Appendix 7

## Job Applicants Privacy Notice – Mandatory

This privacy notice has been written to inform applicants for job vacancies at Ormiston Academies Trust (OAT) about how and why we process their personal data.

## Who are we?

Ormiston Academies Trust is a 'Data Controller' as defined by Article 4 (7) of GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The Trust has appointed Alexandra Coughlan to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the Trust is compliant with GDPR and to oversee data protection procedures. The contact details are:

dpo@ormistonacademies.co.uk
Unit G.05B
Assay Studios
141 Newhall Street
Birmingham
B3 1SF

*Please ensure you include the name of the school in all correspondence with the DPO where appropriate.

## What information do we collect and why do we require it?

The personal data we collect about you includes:

- Personal identifiers (your name, address, date of birth, National Insurance number etc.);
- Previous job experience, qualifications and record (including employment references at shortlisting stage);
- Information about your ethnicity, disability, religious beliefs and sexual orientation (for the purposes of equality and diversity monitoring);
- Information about any criminal convictions you have;
- Where relevant, information about your prohibition from teaching in the UK or European Economic Area
- Where relevant, information about you and members of your household in relation to disqualification from providing childcare under the Childcare Act 2006;
- Information about your right to work in the UK; and
- Relevant medical information which affects your employment.

## Who do we obtain your information from?

Much of the information we process will be obtained directly from you. However, we may need to collect data about you from, but not necessarily limited to, the following organisations. This will usually only be at shortlisting stage:

- DBS,
- The Local Authority,

- Ofsted
- The Police and/or other Law Enforcement bodies
- Previous employers
- The Police and/or other Law Enforcement bodies
- Local Health and/or social care providers

## Who do we share your personal data with?

Your information will only be made available to those who need it to perform the functions of their office or to do their job in relation to your employment. This includes shortlisting and interview/assessment panels and relevant administrative staff. The panels could include individuals from other organisations and we will tell you in advance if that it is the case.

In the case of successful applicants only, we will share your information with the following organisations:

- Provider of HR transactional and Occupational Health services to the trust
- Disclosure and Barring Service to conduct criminal record checks.

## Do you transfer my data outside of the UK?

Generally, the information that the trust holds is all held within the UK. However, some information may be held on computer servers which are held outside of the UK. We will take all reasonable steps to ensure your data is not processed in a country that is not seen as 'safe' by the UK government. If the trust does need to send your data out of the European Economic Area, it will ensure it has extra protection from loss or unauthorised access.

## How long do we keep your personal data for?

We will keep your data in line with our Records Retention Policy. Most of the information we process about you will be retained as determined by statutory obligations. Any personal information which we are not required by law to retain will only be kept for as long as is necessary to fulfil our organisational needs.

## What is our lawful basis for processing your personal data?

The trust is required to process your personal data and your special category data to take necessary steps to enter into an employment contract. The trust is also legally required to collect some information as defined by employment law.

As such the Trust relies on Article 6(1)(b) and Article 9(2)(b) of the UK GDPR to process your personal and special category data. This is in pursuance with Schedule 1, Part 1 (1)(1)(a) of the Data Protection Act 2018 – this means that the Trust can process your data as part of the official authority vested in us by the above legislation.

We will also seek your consent under article 6(a) of the UK GDPR to conduct online checks of your social media accounts at the shortlisting stage.

## What rights do you have over your data?

Under UK GDPR, individuals have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation

- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed

You can exercise any of these rights by contacting: dpo@ormistonacademies.co.uk.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the Trust has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow Cheshire
SK9 5AF

casework@ico.org.uk | 0303 123 1113

# Appendix 8

## Managed Intervention Centre (MIC) Privacy Notice – Mandatory

This privacy notice has been written to inform children who are placed in a Managed Intervention Centre at Ormiston Academies Trust (OAT) about how and why we process their personal data.

## Who are we?

Ormiston Academies Trust is a 'Data Controller' as defined by Article 4 (7) of GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The trust has appointed Alexandra Coughlan to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the trust is compliant with GDPR and to oversee data protection procedures. The contact details are:

dpo@ormistonacademies.co.uk
Unit G.05B
Assay Studios
141 Newhall Street
Birmingham
B3 1SF

*Please ensure you include the name of the school in all correspondence with the DPO where appropriate.

## What information do we collect and why do we require it?

The personal data we collect about you includes:

- Name, title and address
- Gender
- Date of birth
- Guardian contact details
- Ethnicity
- UPN
- Year group
- Home language and EAL stage
- FSM status
- LAC status
- Other agencies involved eg CIN or CP
- Physical, mental and other health records
- Educational and academic records including behaviour record, attendance, punctuality and behaviour points
- Any CPOMS records created by the MIC

## Who do we obtain your information from?

Much of the information we process will be obtained directly from you. However, we may need to collect data about you from, but not necessarily limited to, the following organisations:

- DfE
- The Local Authority,
- The Police and/or other Law Enforcement bodies

## Who do we share your personal data with?

In order to maintain the MIC, we rely on funding from the Education Endowment Fund and the Youth Endowment Fund. As part of the funding agreement, we are required to share certain personal data with EEF. This will include:

- Name
- Pupil Matching Reference
- School ID
- Age
- Gender
- Special Educational Need (y/n)
- Free School Meals (y/n)
- Looked after (y/n)
- Ethnicity
- Attendance rate
- Exclusions
- Project data, such as results of any assessments conducted

At the end of the funding agreement EEF will share certain data with the Office of National Statistics. This will be anonymised.

Third Party Processors - In order to deliver the best possible service, the trust often uses third party organisations. These organisations will sometimes require access to your personal data in order to complete their work. If the trust does use a third party organisation it will always have an agreement in place to ensure that the other organisation keeps your data secure and only uses it for the agreed purpose(s).

Other Organisations - Occasionally the trust is required to pass your data to other organisations. This could be because of a legal requirement or because a court orders the trust to do so. For example, the trust may need to share information with the police to help prevent or detect a crime. The trust may not have to tell you if we do share with other organisations.

## Do you transfer my data outside of the UK?

Generally, the information that the school holds is all held within the UK. However, some information may be held on computer servers which are held outside of the UK. We will take all reasonable steps to ensure your data is not processed in a country that is not seen as 'safe' by the UK government. If the trust does need to send your data out of the European Economic Area, it will ensure it has extra protection from loss or unauthorised access. If you or your

child moves to a school outside of the European Economic Area, then the trust will seek your explicit consent prior to transferring your personal information to that school.

## How long do we keep your personal data for?

We will keep your data in line with our Records Retention Policy. Most of the information we process about you will be retained as determined by statutory obligations. Any personal information which we are not required by law to retain will only be kept for as long as is necessary to fulfil our organisational needs.

## What is our lawful basis for processing your personal data?

Any personal data that we process about our pupils and parents is done so in accordance with Article 6(1) ( e), 6(1)(f) and Article 9(2)(g) of UK GDPR in pursuance with Schedule 1, Part 2 paragraphs 6, 8 and 18 of the Data Protection Act 2018 – this means that the trust can process your data as part of the official authority vested in us by the above legislation.

Our legislation for processing your personal data, in line with Article 6(1)(e) and Article 9(2)(g) includes but is not limited to:

- the Education Act 2002, as amended by the Education Act 2011;
- the School Discipline (Pupil Exclusions and Reviews) (England) Regulations 2012;
- the Education and Inspections Act 2006;
- the Education Act 1996; and
- the Education (Provision of Full-Time Education for Excluded Pupils) (England)
- Regulations 2007, as amended by the Education (Provision of Full-Time
- Education for Excluded Pupils) (England) (Amendment) Regulations 2014
- Exclusion from maintained schools, academies and pupil referral units in England Statutory guidance for those with legal responsibilities in relation to exclusion

## What rights do you have over your data?

Under UK GDPR, individuals have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation
- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed

You can exercise any of these rights by contacting: dpo@ormistonacademies.co.uk.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the trust has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow Cheshire
SK9 5AF

casework@ico.org.uk | 0303 123 1113

# Appendix 9

## Surveillance Systems Privacy Notice – Mandatory

This privacy notice has been written to inform members of the public, parents, pupils and staff of Ormiston Academies Trust (OAT) about how and why we process their personal data in relation to CCTV and e-safety monitoring.

## Who are we?

Ormiston Academies Trust is a 'Data Controller' as defined by Article 4 (7) of GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The Trust has appointed Alexandra Coughlan to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the Trust is compliant with GDPR and to oversee data protection procedures. The contact details are:

dpo@ormistonacademies.co.uk
Unit G.05B
Assay Studios
141 Newhall Street
Birmingham
B3 1SF

*Please ensure you include the name of the school in all correspondence with the DPO where appropriate.

## What information do we collect and why do we require it?

By using closed circuit television (CCTV) systems the trust collects, stores, and uses static or moving images of individuals located in the surveillance area. By using e-safety monitoring software the trust collects and stores: domain names, URLs, browsing information, IP address, usernames, unencrypted traffic from individuals accessing the internet via the trust's IT network. The trust may be able to identify those individuals by using other existing information. The trust operates CCTV and e-safety monitoring software for the following purposes:

- for safeguarding children,
- for the prevention and detection of crime.

## Who do we obtain your information from?

Much of the information we process will be obtained directly from you. However, we may need to collect data about you from, but not necessarily limited to, the following organisations:

- The Police and/or other Law Enforcement bodies

## Who do we share your personal data with?

Your information will only be made available to trust employees where there is a need to investigate. Only authorised employees may have access to CCTV footage and e-safety logs.

E-safety monitoring is provided by a third-party processor. We have contractual clauses in place to ensure the security and integrity of the personal data.

We will only share CCTV footage or e-safety monitoring information with other agencies where there is a lawful reason to do so -for example to share with the police for the purposes of crime prevention or to assist in locating an absconding pupil.

## Do you transfer my data outside of the UK?

Generally, the information that the school holds is all held within the UK. However, some information may be held on computer servers which are held outside of the UK. We will take all reasonable steps to ensure your data is not processed in a country that is not seen as 'safe' by the UK government. If the trust does need to send your data out of the European Economic Area, it will ensure it has extra protection from loss or unauthorised access.

## How long do we keep your personal data for?

The trust will retain this data in line with the time period set out in their CCTV policy. Extracts of recordings required for evidential value will be retained for no longer than is necessary to fulfil the purpose for which they are required.

## What is our lawful basis for processing your personal data?

Our lawful basis for processing your personal data is Article 6(1)(e) and 6(1)(f) respectively:

- 6(1)(e) -Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller –Safeguarding children.
- 6(1)(f) -Processing is necessary for the purposes of legitimate interests-prevention and detection of crime.

## What rights do you have over your data?

Under UK GDPR, individuals have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation
- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed

You can exercise any of these rights by contacting: dpo@ormistonacademies.co.uk.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the Trust has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow Cheshire
SK9 5AF

casework@ico.org.uk | 0303 123 1113