

Privacy Notice General

In accordance with Data Protection legislation, individuals have a right to be informed about how the Trust and its schools use any personal data that is held about them.

We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice has been written to inform individuals who come into contact with or visit a Pontefract Academies Trust school about how and why we process your personal data. It includes when we process information relating to general queries and complaints.

This privacy notice supplements the school's other notices for pupils and parents, the workforce, and governors and volunteers. This Notice may be subject to change.

Who we are

Pontefract Academies Trust is a 'Data Controller' as defined by Article 4 (7) of General Data Protection Regulations (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 Pontefract Academies Trust has appointed Veritau Ltd to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the Pontefract Academies Trust is compliant with GDPR and to oversee data protection procedures. Veritau's contact details are:

Schools Data Protection Officer
Veritau Ltd
County Hall
Racecourse Lane
Northallerton
DL7 8AL

schoolsDPO@veritau.co.uk 01609 532526

Any correspondence with the DPO must include the name of our Trust and the name of the school within our Trust if relevant.

What information we collect

The personal data we collect about you will be dependent on the nature of your contact and relationship with us, but could include:

- Personal details, including name, address and contact information.
- Company details and contact information, if appropriate.
- Details of the reasons for contact with the school, and any communication preferences.
- Visitor information, such as the purpose of your visit and time you enter and leave the school, car registration number and any health conditions or disability access needs you tell us about.
- Photographs or video images, including CCTV footage, if you visit the school site or attend school events.
- Records of communications and interactions we have with you.
- Any details provided by yourself or third parties relating to a complaint investigation, including witness statements and interview notes.

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Why do we collect your personal data?

We process your information for the purposes outlined below:

- To effectively respond to your query or request.
- To comply with a legal or regulatory obligation such as safeguarding and health and safety requirements.
- To process feedback and improve our services.
- To promote the school, including in newsletters, on the school website and social media platforms.
- To effectively administer the school's complaints process.
- To monitor and inform our policies on equality and diversity.

What is our lawful basis for processing your information?

Under the UK GDPR, it is essential to have a lawful basis when processing personal information. We normally rely on the following lawful bases:

- Article 6(1)(a) – consent.
- Article 6(1)(c) - legal obligation.
- Article 6(1)(e) - public task.

Where we are processing your personal data with your consent you have the right to withdraw that consent. If you change your mind or are unhappy with our use of your personal data, please let us know by contacting the school Single Point of Contact (SPOC) which is the headteacher.

There may be occasions where our processing is not covered by one of the legal bases above. In that case, we may rely on Article 6(1)(f) - legitimate interests. We only rely on legitimate interests when we are using your data in ways you would reasonably expect.

Some of the information we collect about you is classed as special category data under the UK GDPR. The additional conditions that allow for processing this data are:

- Article 9(2)(a) - explicit consent.
- Article 9(2)(g) - reasons of substantial public interest.

The applicable substantial public interest conditions in Schedule 1 of the Data Protection Act 2018 are:

- Condition 6 - statutory and government purposes.
- Condition 18 - safeguarding of children and vulnerable people.

Who do we obtain your information from?

We normally receive this information directly from you. However, we may also receive some information from the following third parties:

- Local Authority.
- Department for Education (DfE).
- A child's previous school.
- Ofsted.
- Health and/or social care providers.
- Police and/or other law enforcement bodies.

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Who do we share your personal data with?

We may share your information with the following organisations:

- Department for Education (DfE).
- Local Authority.
- Ofsted.
- Information Commissioner's Office and/or Local Government Ombudsman.

We may also share information with other third parties where there is a lawful basis to do so. For example, we sometimes share information with the police for the purposes of crime detection or prevention.

Some of our schools use Closed Circuit Television (CCTV) cameras for the purposes of monitoring our premises and to support any pupil/student behavioural policies. There are visible signs showing that CCTV is in operation and images from this system are securely stored where only a limited number of authorised persons may have access to them. We may be required to disclose CCTV images to authorised third parties such as the police to assist with crime prevention or at the behest of a court order.

How long do we keep your personal data for?

We will retain your information in accordance with our Information Policy and Retention Schedule. The retention period for most of the information we process about you is 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 reasonably necessary to fulfil its purpose.

We may also retain some information for historical and archiving purposes in accordance with our Information Policy.

International transfers of data

Although we are based in the UK, some of the digital information we hold may be stored on computer servers located outside the UK. Some of the IT applications we use may also transfer data outside the UK.

Normally your information will not be transferred outside the European Economic Area, which is deemed to have adequate data protection standards by the UK government. In the event that your information is transferred outside the EEA, we will take reasonable steps to ensure your data is protected and appropriate safeguards are in place.

What rights do you have over your data?

Under data protection legislation, you have the right to request access to information about you that we hold. This is referred to as a 'Subject Access Request'. To make a request for your personal information email dpo@patrust.org.uk.

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You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress,
- Prevent processing for the purpose of direct marketing,
- Object to decisions being taken by automated means,
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- Claim compensation for damages caused by a breach of the Data Protection Regulations.

Contact

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.gsi.gov.uk

Telephone: 03031 231113 (local rate) or

Telephone: 01625 545 745 (national rate number)

Further information

If you would like to discuss anything in this privacy notice, please email dpo@patrust.org.uk