

Under data protection law, individuals have a right to be informed about how the Trust uses any personal data we hold 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 explains how we collect, store and use personal data about:

- Parents and carers of children at our schools (see p4-5)
- Employees of the Trust (p6-7)
- Volunteers, including Trustees and local committee members (p8-9)
- Job Applicants (p10)

A separate privacy notice is published for pupils at Astrea's schools.

We, Astrea Academy Trust, are the 'data controller' for the purposes of data protection law. Our Data Protection Officer is Melanie Basson (see 'Contact us' below).

### **Collecting this information**

While the majority of the information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

### Our legal basis for using this data

We only collect and use individuals' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legalobligation
- We need it to perform an official task in the public interest

### Less commonly, we may also process personal data in situations where:

- We have obtained consent to use it in a certainway
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using personal data overlap and there may be several grounds which justify our use of this data.

### **Transferring data internationally**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.



## Use of your personal information for marketing purposes

Where you have given us consent to do so, the trust may send you marketing information by e-mail or text promoting trust, events, campaigns, charitable causes or services that may be of interest to you. You can "opt out" of receiving these texts and/or e-mails at any time by clicking on the "Unsubscribe" link at the bottom of any such communication, or by contacting our Data Protection Officer.

## Your rights

### How to access personal information we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 13), or where the child has provided consent.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our Data Protection Officer.

Parents/carers can access to their child's educational record on request. To request access, please contact the Academy Principal.

### Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

to exercise any of these rights, please contact our Data Protection Officer.



### **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- 1. Report a concern online at https://ico.org.uk/concerns/
- 2. Call 0303 123 1113; or
- 3. Write to:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF

### Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer:

### **Melanie Basson**

c/o Astrea Academy Trust, The Hub Hartley Brook Road Sheffield S5 OJF

Email: DPO@astreaacademytrust.org



### **Parents and Carers**

#### The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about you and your children includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

### Why we use this data

#### We use this data to:

- Support pupil learning
- · Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing

### How we store this data

We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Our Data Protection Policy sets out how long we keep information about pupils.

A copy of the Data Protection Policy is available on the Academy website or can be requested via the academy office.

### Data sharing

We do not share information about pupils with any third party without consent unless the law and our policies allow us to do so.



Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about pupils with:

- Our local authority to meet our legal obligations to share certain information with it, such as safequarding concerns and exclusions
- The Department for Education
- The pupil's family and representatives
- Educators and examining bodies
- Our regulators
- Suppliers and service providers to enable them to provide contracted services
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

### **National Pupil Database**

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census and early years census where appropriate.

Some of this information is then stored in the <u>National Pupil Database</u> (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on how it collects and shares research data.

You can also contact the Department for Education with any further questions about the NPD.

### Schools with pupils aged 13+ insert:

#### Youth support services

Once our pupils reach the age of 13, we are legally required to pass on certain information about them to, [name of local authority or youth support services provider in your area], as it has legal responsibilities regarding the education or training of 13-19 year-olds.



This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Parents/carers, or pupils once aged 16 or over, can contact our Data Protection Officer to request that we only pass the individual's name, address and date of birth to the local authority or youth support services provider.

### **Employees of the Trust**

### The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our academy. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs
- CCTV footage
- Data about your use of the school's information and communications system

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records

### Why we use this data

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning



- Enable equalities monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

#### How we store this data

Personal data is stored in line with our data protection policy.

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our data protection policy.

A copy of the Data Protection Policy is available on the Academy website or can be requested via the academy office.

### Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- Our local authority to meet our legal obligations to share certain information with it, such as safeguarding concerns.
- The Department for Education
- Your family or representatives
- Educators and examining bodies
- Our regulators
- Suppliers and service providers to enable them to provide the service we have contracted them for, such as payroll
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Trade unions and associations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies



### **Volunteers**

### The personal data we hold

We process data relating to those volunteering at our [school/trust]. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- References
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This may include information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability and access requirements

#### Why we use this data

- The purpose of processing this data is to support the [school/trust] to:
- Establish and maintain effective governance
- Meet statutory obligations for publishing and sharing [governors'/trustees'] details
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Undertake equalities monitoring
- Ensure that appropriate access arrangements can be provided for volunteers who require them

#### Collecting this information

While the majority of the information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

### How we store this data

Personal data is stored in accordance with our data protection policy.

We maintain a file to store personal information about all volunteers. The information contained in this file is kept secure and is only used for purposes directly relevant to your work with the trust.

When your relationship with the trust has ended, we will retain and dispose of your personal information in accordance with our data protection policy.

A copy of the Data Protection Policy is available on the Academy website or can be requested via the academy office.



### Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Government departments or agencies to meet our legal obligations to share information about governors/trustees
- Our local authority to meet our legal obligations to share certain information with it, such as details of governors
- Suppliers and service providers to enable them to provide the service we have contracted them for, such as governor/trustee support
- Professional advisers and consultants
- Employment and recruitment agencies
- Police forces, courts

### **Job Applicants**

#### The personal data we hold

We process data relating to those applying to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Copies of right to work documentation
- References
- Evidence of qualifications
- Employment records, including work history, job titles, training records and professional memberships

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability and access requirements

### Why we use this data

The purpose of processing this data is to aid the recruitment process by:

- Enabling us to establish relevant experience and qualifications
- Facilitating safe recruitment, as part of our safeguarding obligations towards pupils
- Enabling equalities monitoring
- Ensuring that appropriate access arrangements can be provided for candidates that require them

#### How we store this data

Personal data we collect as part of the job application process is stored in line with our data protection policy.



When it is no longer required, we will delete your information in accordance with our data protection policy.

The data protection policy can be found on the trust website or can be obtained by contacting our Data Protection Officer.

### Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- Our local authority to meet our legal obligations to share certain information withit.
- Suppliers and service providers to enable them to provide the service we have contracted them for, such as HR and recruitment support
- Professional advisers and consultants
- Employment and recruitment agencies