



# PRIVACY NOTICE (2019-2021)

Privacy Notice

MAT Board Approval:

December 2019

Review Date:

Autumn 2021

Member of Staff Responsible:

Mrs Claire Davies

## Our Vision

‘To Love, To Learn, To Serve’ sums up the DoWMAT’s vision for those who come together to create the MAT, enabling all to flourish both as individuals and in community with each other; living life in all its fullness (John 10:10).





## Our Values

### To Love

The New Testament sums up the entire law as a call to “love your neighbour as yourself” (Galatians 5:14). The Bible teaches that we are only able to love because God first loved us (1 John 4:10). This love is expected to characterise the way in which the DoWMAT operates, makes decisions, builds relationships, and carries out its day-to-day business: each person putting the needs of others before their own, with a commitment to the flourishing of all. The exposition of love in 1 Corinthians 13 reminds us that love is patient, kind, forgiving, generous, humble, trusting, respectful, hopeful, resilient and enduring. Those who learn and work in the DoWMAT, and all who come into contact with it, can expect to experience that love in the way that they are treated.



### To Learn



The DoWMAT is a Christian learning community that is committed to enabling all to live a life of freedom and transformation as a result of the hope and wisdom that learning brings. Learning is at the heart of the Church of England’s vision for and commitment to education. Growing in wisdom is celebrated in the Bible and all are exhorted to listen, to seek guidance, to acquire knowledge and to learn discretion (Proverbs 1: 1-6), largely through human relationships and interactions. Jesus’ teaching, as summed up in the Beatitudes (Matthew 5:3-10), describes human beings who are learning to live a life that is characterised by humility, compassion, mercy, righteousness and peace. The learning that takes place within the DoWMAT is expected to be recognisably rooted in these godly characteristics and focused upon enabling the holistic development of people who are made in the image of God.

### To Serve

Service and servant leadership, was a striking feature of the way in which Jesus lived his life. The example he gave to his disciples in washing their feet (John 13:1-17) provides us with a role model for the way in which we should seek to live in community with others. Putting the needs of others before our own, supporting people in their growth and development as holistic human beings, enabling people’s gifts and talents to come to the fore as a result of our service to them are all defining characteristics of the way in which the DoWMAT operates. In serving others and meeting their needs through generosity of spirit, we manifest God’s grace and love for others (1 Peter 4:8-11).



These core values underpin all aspects of our Trust as we strive to make a positive difference to the lives of all DoWMAT pupils whilst they are at school and in later life. Through these values, we can be sure our community is one of hope; a place of transformation and trust, where all are treated with respect and dignity.

**OUTSTANDING PROFESSIONALS | COLLABORATIVE PARTNERSHIPS | STRONG SYSTEMS | CONFIDENT LEARNERS**

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## A. PRIVACY NOTICE FOR PARENTS/CARERS

### 1. INTRODUCTION

Under data protection law, individuals have a right to be informed about how the school uses any personal data that 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 **pupils**.

As we are a member of the Diocese of Worcester Multi Academy Trust (DoWMAT), it is the responsibility of the Trust to ensure all data is dealt with in accordance with the relevant legislation.

The Trust, and each academy within the Trust, are the 'data controllers' for the purposes of data protection law.

Our Trust Data Protection Officer is **Mrs Claire Roberts** (see 'Contact us' below).

### 2. THE PERSONAL DATA WE HOLD

Personal data that we may collect, use, store and share (when appropriate) about pupils 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.

### 3. 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.

### 4. OUR LEGAL BASIS FOR USING THIS DATA

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

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

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

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

Where we have obtained consent to use pupils' 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 pupils' personal data overlap, and there may be several grounds which justify our use of this data.

## 5. COLLECTING THIS INFORMATION

While the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

## 6. 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 record retention schedule sets out how long we keep information about pupils.

You can request a copy of our record retention schedule by writing to our Data Protection Officer.

## 7. 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 safeguarding concerns and exclusions.
- The Department for Education.
- The pupil’s family and representatives.
- Educators and examining bodies.
- Our regulator: Ofsted.
- Suppliers and service providers – to enable them to provide the service we have contracted them for.
- Financial organisations.
- Central and local government.
- Health authorities.
- Health and social welfare organisations.
- Professional advisers and consultants.
- Charities and voluntary organisations.

- Police forces, courts, tribunals.
- Professional bodies.

## 8. 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.

Some of this information is then stored in the [National Pupil Database \(NPD\)](#), 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.

## 9. 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.

## 10. PARENTS AND PUPILS' RIGHTS REGARDING PERSONAL DATA

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 12), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

If you make a subject access request, and if we do hold information about you or your child, 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 or your child.
- 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.

Individuals also have the right for their 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 also have a legal right to access to their child's **educational record**. To request access, please contact your child's academy.

## 11. OTHER RIGHTS

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

- Object to the use of personal data if it would cause, or is causing, damage or distress.
- Prevent it being used to send direct marketing.
- Object to 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.

## 12. 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, in line

with our **Complaints Policy** that can be found on our website or requested as a paper copy from the school office.

To make a complaint about the collection or use of personal information, please contact our **Data Protection Officer**.

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

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

### 13. 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**:

**Mrs Claire Roberts**

Email: [claire.roberts@dowmat.education](mailto:claire.roberts@dowmat.education)

or, by post to: Field House, 29 Sansome Walk, Worcester, WR1 1NU

*This notice is based on the Department for Education's model privacy notice for pupils, amended for parents and reflects the way we use data in this school.*

## B. PRIVACY NOTICE FOR STAFF

### 1. INTRODUCTION

Under data protection law, individuals have a right to be informed about how the school uses any personal data that 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 individuals we employ, or otherwise engage, to work at our school.

The Trust, and each academy within the Trust, are the 'data controllers' for the purposes of data protection law.

Our Trust Data Protection Officer is **Mrs Claire Roberts** (see 'Contact us' below).

## 2. THE PERSONAL DATA WE HOLD

We process data relating to those we employ, or otherwise engage, 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.
- 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.

*\*Bank account details are currently not held at school but by the Local Authority Payroll.*

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.

## 3. 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 ethnicity and disability monitoring.
- Improve the management of workforce data across the sector.
- Support the work of the School Teachers' Review Body.

#### 4. OUR LAWFUL BASIS FOR USING THIS DATA

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you.
- Comply with a legal obligation.
- Carry out a task in the public interest.

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way.
- We need to protect your vital interests (or someone else's interests) .
- We have legitimate interests in processing the data – for example, where:
  - A safeguarding or disciplinary matter potentially put a pupil, parent or other member of the public at risk.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

#### 5. COLLECTING THIS INFORMATION

While the majority of 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.

## 6. HOW WE STORE THIS DATA

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 record retention schedule. You can request a copy of this by contacting the DPO in writing.

## 7. 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 and information about head teacher performance and staff dismissals
- The Department for Education
- Your family or representatives
- Educators and examining bodies
- Our regulator Ofsted
- 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
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies

## 8. 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.

## 9. 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.

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

- Give you a description of it.
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- 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.

## 10. 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.

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To make a complaint, please contact our data protection officer.

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

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or, by post to: Field House, 29 Sansome Walk, Worcester, WR1 1NU

*This notice is based on the Department for Education's model privacy notice for the school workforce, amended to reflect the way we use data in this school.*

Ref: CD/Nov19