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Company Registration Number: 10745840 (England and Wales)

Ethos Academy Trust

# Data Protection Policy

## May 2025

ETHOS ACADEMY TRUST

Nurturing inclusive learning communities

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|---|---|---|---|---|---|
| 1 | **Summary** | Data Protection Policy | | | |
| 2 | **Responsible person** | Chief Finance and Operating Officer | | | |
| 3 | **Accountable ELT member** | Chief Finance and Operating Officer | | | |
| 4 | **Applies to** | ☒All Staff<br>☐Support Staff<br>☐Teaching Staff | | | |
| 5 | **Trustees and/or individuals who have overseen development of this policy** | Finance, Audit and Risk Committee | | | |
| 6 | **Headteachers/Service Heads who were consulted and have given approval (if applicable)** | N/A | | | |
| 8 | **Ratifying committee(s) and date of final approval** | Finance, Audit and Risk Committee<br>01.05.25 | | | |
| 9 | **Version number** | 2.1 | | | |
| 10 | **Available on** | Every | ☒Y<br>☐N | Trust Website<br>Academy Website<br>Staff Portal | ☒Y☐N<br>☒Y☐N<br>☒Y☐N |
| 11 | **Related documents (if applicable)** | | | | |
| 12 | **Disseminated to** | ☐Trustees<br>☒All Staff<br>☐Support Staff<br>☐Teaching Staff | | | |
| 13 | **Date of implementation (when shared)** | 07/05/2025 | | | |
| 14 | **Date of next formal review** | May 2026 | | | |
| 15 | **Consulted with Recognised Trade Unions** | ☐Y ☒N | | | |

| Date | Version | Action | Summary of changes |
|---|---|---|---|
| 24.11.21 | 1.7 | Evolve Academy policy review | Wakefield Council data protection links added |
| 01.02.23 | 1.8 | Ethos policy review | Rotherham data protection links added |
| 01.02.24 | 2.0 | Ethos policy review | Some minor reformatting |
| 01.05.25 | 3.0 | Ethos policy review | Update of specific links that were out-of-date |

**Responsibility:** It is the responsibility of the Board of Trustees to ensure procedures are in place to ensure that Ethos Academy Trust complies with Data Protection legislation, e.g. including, but not limited to, the General Data Protection Regulation (GDPR) and The Data Protection Act.

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## 1. Introduction

In order to operate efficiently, Ethos Academy Trust has to collect and use information about people with whom it works and the pupils it supports. These may include members of the public, current, past and prospective employees and pupils, customers and suppliers. In addition, it may be required by law to collect and use information in order to comply with the requirements of central government.

Ethos Academy Trust is committed to ensuring personal data is properly managed and that it ensures compliance with current data protection legislation. Ethos Academy Trust will make every effort to meet its obligations under the legislation and will regularly review procedures to ensure that it is doing so.

## 2. Scope

This policy applies to all employees, Trustees, contractors, agents and representatives, volunteers and temporary staff working for or on behalf of Ethos Academy Trust.

This policy applies to all personal data created or held by Ethos Academy Trust in whatever format (e.g. paper, electronic, email, microfiche, film) and however it is stored, (for example, ICT system/database, shared drive filing structure, workbooks, OneDrive, email, filing cabinet, shelving and personal filing drawers).

Personal data is information about living, identifiable individuals, or an identifier or identifiers that can be used to identify a living individual. It covers both facts and opinions about the individual. Such data can be part of a computer record or manual record.

Current data protection legislation does not apply to access information about deceased individuals. However, the duty of confidentiality may continue after death.

## 3. Responsibilities

Overall responsibility for ensuring that Ethos Academy Trust meets the statutory requirements of any data protection legislation lies with the Board of Trustees. The Chair of the Board has overall responsibility for information management issues. They have delegated the day-to-day responsibility of implementation to the Data Protection Officer (DPO).

The DPO is responsible for ensuring compliance with data protection legislation and this policy within the day-to-day activities of Ethos Academy Trust. The DPO

is responsible for ensuring that appropriate training is provided for all staff. This is provided at least annually to key staff in person or on Microsoft Teams.

All contractors who hold or collect personal data on behalf of Ethos Academy Trust by way of written contract are responsible for their own compliance with data protection legislation and must ensure that personal information is kept and processed in line with data protection legislation and only upon instruction from Ethos Academy Trust, via a contract.

## 4. The Requirements

Data protection legislation stipulates that anyone processing personal data must comply with principles of good practice; these principles are legally enforceable. The 6 principles require that personal data:

1. Shall be processed fairly and lawfully and transparently;
2. Shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes;
3. Shall be adequate, relevant and not excessive in relation to the purpose or purposes for which it is processed;
4. Shall be accurate and where necessary, kept up to date;
5. Shall not be kept for longer than is necessary for that purpose or those purposes;
6. Shall be kept secure i.e. protected by an appropriate degree of security.

In addition, the data shall be processed in accordance with the rights of data subjects.

Personal data shall also not be transferred to a country unless that country or territory ensures an adequate level of data protection or another secure method of transfer is guaranteed.

## 5. Notification

The Digital Economy Act 2017 requires every data controller who is processing personal data, to notify and renew their notification, on an annual basis. Failure to do so is a criminal offence. The Information Commissioner maintains a public register of data controllers, in which Ethos Academy Trust must be registered.

The Ethos Academy Trust will review the Data Protection Register (https://ico.org.uk/esdwebpages/search) annually, prior to renewing its notification to the Information Commissioner.

## 6. Privacy Notices

Whenever information is collected about individuals, they must be made aware of the following at that initial point of collection:

- The identity of the data controller, e.g.  the School;
- Contact details of the Data Protection Officer;
- The purpose that the information is being collected for;
- Any other purposes that it may be used for;
- What the lawful basis is for processing the data;
- Who the information will or may be shared with;
- If the data is transferred outside of the EU, and if yes, how is it kept secure;
- How long the data will be kept for; and
- How data subjects can exercise their rights.

The Ethos Academy Trust will review its Privacy Notice annually and alert pupils and parents to any updates.

## 7. Conditions for Processing

Processing of personal information may only be carried out where one of the conditions of Article 6 of the GDPR has been satisfied.

Processing of special category (sensitive) personal data may only be carried out if a condition in Article 9 of the GDPR is met as well as one in Article 6.

## 8. Data Protection Officer

Ethos Academy Trust has appointed a Data Protection Officer in line with the requirements of the GDPR. The Ethos Academy Trust's Data Protection Officer is Neil Stott.

## 9. Data Protection Impact Assessments

If the Trust should start to process operations for which is deemed 'high risk' e.g. biometric data, the Trust shall undertake high risk Data Protection Impact Assessments in line with the requirements of the GDPR and as per the Information Commissioner's Office (ICO) guidance.

## 10. Data Breaches

All employees, Trustees, contractors, agents and representatives, volunteers and temporary staff shall report a security incident or data breach immediately to senior management and Ethos Academy Trust's Data Protection Officer.

The Ethos Academy Trust shall report any personal data breach to the ICO in line with the requirements of the GDPR.

## 11. Contracts

Ethos Academy Trust shall ensure that a legally binding contract is in place with all of its data processors in line with the requirements of the GDPR.

## 12. Consent

Where Ethos Academy Trust processes data with consent (for example, to publish photographs of children, to send direct marketing emails) it will ensure that the consent is freely given, specific, informed and unambiguous, and the consent is recorded.

## 13. Information Society Services

Where Ethos Academy Trust offers Information Society Services (online services with a commercial element) targeted at children, it will take reasonable steps to seek the consent of the child's parent or guardian if the child is under 13 years of age.

## 14. Direct Marketing

Where Ethos Academy Trust sends any direct marketing (the promotion of aims and ideals as well as selling goods and services) via electronic communications, e.g. email, SMS text, fax or recorded telephone messages, it will only do so if the recipient has given explicit consent to receive them, e.g. has ticked a box to 'opt in'.

## 15. Provision of Data

It is a criminal offence to knowingly or recklessly obtain or disclose information about an individual without legitimate cause. Relevant, confidential data should only be given to:

- Other members of staff on a need to know basis;
- Relevant Parents/Guardians;
- Other authorities if it is necessary in the public interest, e.g. prevention of crime, safeguarding;
- Other authorities, such as the Local Authority and schools to which a pupil may move, where there are legitimate requirements (see link below for further information).

Data protection in schools - Record keeping and management - Guidance - GOV.UK

The Ethos Academy Trust should not disclose anything on a pupil's record which would be likely to cause serious harm to their physical or mental health or that of anyone else. Therefore, those who create such records should ensure that such information is separated from other records.

Where there is doubt, or statutory requirements conflict, legal advice should be obtained. Where there are safeguarding concerns, the matter should be referred to Ethos Academy Trust's Designated Safeguarding Leads (DSL's).

When giving information to an individual, particularly by telephone, it is most important that the individual's identity is verified. If in doubt, questions should be asked of the individual, to which only he/she is likely to know the answers. Information should not be provided to other parties, even if related. For

example, in the case of divorced parents it is important that information regarding one party is not given to the other party to which he/she is not entitled. Care must always be taken when there is any doubt about parental responsibility. Office staff are trained on this element as part of their induction.

## 16. The Individual's Rights

Any person whose details are held by Ethos Academy Trust is entitled to ask for a copy of information held about them (or child for which they are responsible). They are entitled to see if the data held are accurate, and who it is shared with.

When a request is received it must be dealt with promptly; a response must be provided as soon as possible and within one month and in some instances, for education records, 15 school days. All staff must recognise and log such a request with the Data Protection Officer.

The Ethos Academy Trust cannot charge for responding to a subject access request unless the request is repeated manifestly unfounded or excessive. The Ethos Academy Trust can charge up to £50 (on a sliding scale for photocopying charges) for access to a pupil's Educational Record.

When providing the information Ethos Academy Trust must also provide a description of why the information is processed, details of anyone it may be disclosed to and the source of the data.

Staff of Ethos Academy Trust must also recognise and log the following requests with the Data Protection Officer, and all must be answered within one month:

- Right to Rectification
- Right to Erasure
- Right to Restriction
- Right to Portability
- Right to Object
- Right to Prevent Automated Processing
- Right to Complain

## 17. Provision of Data to Children

In relation to the capacity of a child to make a subject access request, guidance provided by the ICO has been that by the age of 12 a child can be expected to have sufficient maturity to understand the nature of the request. A child may of course reach sufficient maturity earlier; each child should be judged on a case by case basis.

If the child does not understand the nature of the request, someone with parental responsibility for the child, or a guardian, is entitled to make the request on behalf of the child and receive a response.

Pupils who submit requests to access their educational records should be

allowed to do so unless it is obvious that they do not understand what they are asking for.

## 18. Parents' Rights

An adult with parental responsibility can access the information about their child, as long as the child is not considered to be sufficiently mature. They must be able to prove their parental responsibility and Ethos Academy Trust is entitled to request relevant documentation to evidence this as well as the identity of the requestor and child. The Ethos Academy Trust has the right to ask the Child if they object to release of information to the Parent if the Child is deemed mature enough to make such a decision.

In addition, parents have their own independent right under The Education (Pupil Information) (England) Regulations 2000 of access to the official education records of their children. Students do not have a right to prevent their parents from obtaining a copy of their school records (as defined in the Education Act).

## 19. Information Security

All members of staff should be constantly aware of the possibility of personal data being seen by unauthorised personnel. For example, possibilities may arise when computer screens are visible to the general public; files may be seen by the cleaners if left on desks overnight (all papers must be locked in cabinets when not in use).

The use of computer passwords is a requirement of Ethos Academy Trust to avoid unauthorised access. All removable devices, e.g. laptops, USB sticks, personal mobile phones and digital cameras must not be used to store School data unless they comply with an Ethos Academy Trust's Bring Your Own Device (BYOD) policy, and should be encrypted and password protected wherever possible.

All members of staff should take care when transporting paper files between sites or laptops, mobile phones etc. No personal data or electronic device including laptop or mobile phone is ever to be left unattended off site, e.g. in a car overnight, on view to family members when working at home.

All members of staff should take care when emailing personal data and always check the email address is correct and the right attachment has been attached. When copying to several people externally, all members of staff must always use the BC field and not the CC field nor create a group.

## 20. Maintenance of Up-to-Date Data

Out of date information should be discarded if no longer relevant. Information should only be kept as long as needed, for legal or business purposes. In reality most relevant information should be kept for the period during which the person is associated with Ethos Academy Trust plus an additional period which Ethos

Academy Trust has determined. Under GDPR Ethos Academy Trust must produce a Retention and Disposal Policy to clarify this.

## 21. Inaccurate Data

If an individual complains that the personal data held about them is wrong, incomplete or inaccurate, the position should be investigated thoroughly including checking with the source of the information. This must be answered within one month. In the meantime, a caution should be marked on the person's file that there is a question mark over the accuracy. An individual is entitled to apply to the court for a correcting order and it is obviously preferable to avoid legal proceedings by working with the person to correct the data or allay their concerns.

## 22. Recording of Data

Records should be kept in such a way that the individual concerned can inspect them. It should also be borne in mind that at some time in the future the data may be inspected by the courts or some legal official. It should therefore be correct, unbiased, unambiguous, factual and clearly decipherable/readable. Where information is obtained from an outside source, details of the source and date obtained should be recorded.

Any person whose details, or child's details, are to be included on Ethos Academy Trust's website will be required to give written consent unless it is a legal requirement (e.g. Trustees' details). At the time the information is included all such individuals will be properly informed about the consequences of their data being disseminated worldwide.

## 23. Photographs

Whether or not a photograph comes under the data protection legislation is a matter of interpretation and quality of the photograph. However, Ethos Academy Trust takes the matter extremely seriously and seeks to obtain parents' permission for the use of photographs outside Ethos Academy Trust and, in particular, to record their wishes if they do not want photographs to be taken of their children.

## 24. Breach of the Policy

Non-compliance with the requirements of data protection legislation by the members of staff could lead to serious action being taken by third parties against Ethos Academy Trust. Non-compliance by a member of staff is therefore considered a disciplinary matter which, depending on the circumstances, could lead to dismissal. It should be noted that an individual can commit a criminal offence under the law, for example, by obtaining and/or disclosing personal data for his/her own purposes without the consent of the data controller.

## 25. Further Information

Further advice and information about data protection legislation, including full details of exemptions, is available from the ICO website at www.ico.org.uk, or from our Local Authority data protection teams:
Kirklees - information.governance@kirklees.gov.uk
Wakefield - dataprotection@wakefield.gov.uk
Rotherham - General Data Protection Regulation enquiry – Rotherham Metropolitan Borough Council

## 26. Review of the Policy

This policy is to be reviewed annually.

## 27. Glossary

| | |
|---|---|
| Data Controller | A data controller is the individual or the legal person who controls and is responsible for the keeping and use of personal information on computer or in structured manual files. |
| Data Subject | The individual who the data or information is about |
| Educational record | The educational record is confined to information that comes from a teacher or other employee of a local authority or school, the pupil or their parents. Communications about a particular child from head teachers and teachers at a school and other employees at an education authority will therefore form part of that child's official educational record, as will correspondence from an educational psychologist engaged by the governing body under a contract of services. It may also include information from the child and their parents, such as information about the health of the child. Information kept by a teacher solely for their own use does not form part of the official educational record. |
| Information Commissioner | The independent regulator who has responsibility to see that the data protection legislation is complied with. They can give advice on data protection issues and can enforce measures against individuals or organisations who do not comply with the law. |
| Notified Purposes | The purposes for which the school is entitled to process that data under its notification with the Office of the Information Commissioner. |

| | |
|---|---|
| Personal Data | Defined as 'data which relates to a living individual who can be identified from that data, or from that data and other information which is in the possession of, or is likely to come into the possession of, the data controller' or an identifier (the school is a data controller), and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other in respect of the individual. |
| Processing | Covers a broad range of activities such that virtually any use of personal information or data will amount to processing. Just holding or storing the data constitutes processing. |
| Processed fairly and lawfully | Data must be processed in accordance with the provisions of data protection legislation. These include the data protection principles, the rights of the individual and notification. |
| Special Category (sensitive) Data | Information about racial or ethnic origin, sexual life, religious beliefs (or similar), physical or mental health/condition, membership of a trade union, political opinions or beliefs, or biometric or genetic data. |
| Subject Access Request | An individual's request for personal data under the General Data Protection Regulation. |

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http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/

## 28. Data Retention

Data is retained in-line with current guidelines.  The Trusts has a Data Retention Policy that is available upon request.
Once data reach the end of their retention period, they are destroyed; electronic records are deleted, and paper copies are shredded.

## 29. Home Working

Staff should apply the same standards of care to data protection whether working from home or in a school setting. The Acceptable Use Policy gives further details about how IT equipment and systems should be utilised. Staff should pay due regard to personal data when working from home and should not let friends or family members use Trust IT equipment or access systems, including email, SchoolPod etc. The use of personal computers is discouraged and if these are used to access any school systems, a password should be put on the equipment to avoid unauthorised access.

**Appendix 1: Pupil Privacy Notice**

*2024/25*

*Privacy Notice (how we use pupil information)*

*for*

*Pupils in schools, alternative provision,*
*pupil referral units and children in early years settings*

**The categories of pupil information that we collect, hold and share include:**

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal / pupil premium / early years pupil premium eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Assessment Information
- Medical conditions
- Special Educational Needs and Disability
- Behavior and exclusions
- Education/school history
- Photographs

**Why we collect and use this information**

We use the pupil data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing
- to safeguard students
- to promote the activities of the school

The lawful basis on which we use this information:

On the 25th May 2018 the Data Protection Act 1998 was replaced by the General Data Protection Regulation (GDPR).

**The condition for processing under the GDPR is:**

Article 6

1. Processing shall be lawful only if and to the extent that at least one of the following applies:

(c) Processing is necessary for compliance with a legal obligation to which the controller is subject;

Article 9

1. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.

2. Paragraph 1 shall not apply if one of the following applies:

(j) Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

The Education (Information about Individual Pupils) (England) Regulations 2013 - Regulation 5 'Provision of information by non-maintained special schools and Academies to the Secretary of State' states 'Within fourteen days of receiving a request from the Secretary of State, the proprietor of a non-maintained special school or an Academy (shall provide to the Secretary of State such of the information referred to in Schedule 1 and (where the request stipulates) in respect of such categories of pupils, or former pupils, as is so requested.'
The Education Act 1996 - Section 537A – states that we provide individual pupil information as the relevant body such as the Department for Education.
Children's Act 1989 – Section 83 – places a duty on the Secretary of State or others to conduct research.

**Collecting pupil information**
Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

**Storing pupil data**
We hold pupil data in line with our data retention schedule.
Who we share pupil information with
We routinely share pupil information with:

- learning providers that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- mainstream schools from which pupils are referred
- Social Services
- Locala (school nurse)
- Curriculum providers (examination boards)
- OfSTED
- Police, courts

**Why we share pupil information**
We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.
We share pupils' data with our local authority (LA) and the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring. For further information go to
http://www.kirklees.gov.uk/beta/information-and-data/how-we-use-your-data.aspx

Access to information - Wakefield Council

General Data Protection Regulation enquiry – Rotherham Metropolitan Borough Council

We are required to share information about our pupils with our local authority (LA) and the Department for Education (DfE) under section 4 of The Education (Information About Individual Pupils) (England) Regulations 2013. Sections 7 and 7A of the Childcare Act 2006 and section 2 of the Childcare Act 2016.
Data collection requirements:
To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

## The National Pupil Database (NPD)
The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.
We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information

About Individual Pupils) (England) Regulations 2013.
To find out more about the NPD, go to https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information.
The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.
For more information about the department's data sharing process, please visit:
https://www.gov.uk/data-protection-how-we-collect-and-share-research-data
For information about which organisations the department has provided pupil information, (and for which project), please visit the following website:
https://www.gov.uk/government/publications/national-pupil-database-requests-received

To contact DfE: https://www.gov.uk/contact-dfe

## Requesting access to your personal data

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact gdpr@eat.uk.com

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

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/

**Contact**
If you would like to discuss anything in this privacy notice, please contact our Data Protection Officer:
Neil Stott
Email: gdpr@eat.uk.com

**Or:**
Kirklees Council, Information Governance Team

Email: information.governance@kirklees.gov.uk
Telephone: 01484 221000

Wakefield Council - Access to information - Wakefield Council

Rotherham Council - General Data Protection Regulation enquiry – Rotherham Metropolitan Borough Council

Ministerial and Public Communications Division
Department for Education Telephone: 0370 000 2288
Piccadilly Gate
Manchester
M1 2WD

Website:https://www.gov.uk/government/organisations/department-for-education
Email: http://www.education.gov.uk/help/contactus

## Appendix 2: Parent Privacy Notice

*2024/25*

*Privacy Notice (how we use your personal information)*
*for*
*Parents of ETHOS ACADEMY TRUST pupils*

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 **you**.
We, (ETHOS ACADEMY TRUST], are the 'data controller' for the purposes of data protection law.
Our data protection officer is Neil Stott (see 'Contact us' below).

### The personal data we hold

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

- Contact details and contact preferences
- Photographs
- CCTV images captured in school

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):

- Characteristics, such as ethnicity, languages spoken and eligibility for certain benefits
- Family circumstances
- Physical and mental health, including medical conditions
- Support received, including care packages, plans and support providers

We may also hold data about you that we have received from other organisations, including other schools and social services.

## Why we use these data

We use these data to:

- Report to you on your child's attainment and progress
- Keep you informed about the running of the school (such as emergency closures) and events
- Process payments for school services and clubs
- Provide appropriate pastoral care
- Protect pupil welfare
- Administer admissions waiting lists
- Assess the quality of our services
- Carry out research
- Comply with our legal and statutory obligations

## Use of your personal data for marketing purposes

Where you have given us consent to do so, the ETHOS ACADEMY TRUST may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you. You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting our data protection officer.

## Our legal basis for using these data

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

- We need to comply with a legal obligation
- We need to perform an official task in the public interest
- We need to fulfil a contract we have entered into with you

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

- We have obtained consent to use it in a certain way
- We need to protect an individual's vital interests (protect their life)

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 would go about withdrawing consent if you wish to do so.

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

## Collecting this information

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

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 these data

We keep personal information about you while your child is 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 parents and carers; a copy of this document can be found on the school's website.

## Data sharing

We do not share information about you 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 you with:

- *Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions*
- *Government departments or agencies*
- *Our regulator, [specify as appropriate, e.g. Ofsted, Independent Schools Inspectorate]*
- *Suppliers and service providers – to enable them to provide the service we have contracted them for*
- *Financial organisations*
- *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*

## 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.

## Your rights

### How to access personal information that 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
- 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.

### 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:

- 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

## 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:

Neil Stott
Email: gdpr@eat.uk.com

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

## Appendix 3: Workforce Privacy Notice

*2024/25*

*Privacy Notice (how we use workforce information)*
*for*
*Staff in schools, alternative provision,*
*pupil referral units and children in early years settings*

### Privacy notice for the school workforce

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.

We, Ethos Academy Trust PRU, are the 'data controller' for the purposes of data protection law.

Our data protection officer is Neil Stott (see 'Contact us' below).

### 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

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

## 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)

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.

## 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.

## 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 record retention schedule, a copy of which is accessible on our website.

## 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 headteacher 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*
- *Charities and voluntary organisations*
- *Police forces, courts, tribunals*
- *Professional bodies*
- *Employment and recruitment agencies*
- *Peritus Health Management (Occupational Health)*

## 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.

## 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
- 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.

## 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:

- 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

## 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:

Neil Stott
Email: gdpr@eat.cuk.com

*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.*

## Appendix 4: Visitor Privacy Notice

*2024/25*

*Privacy Notice (how we use visitors' information)*

*For*

*Visitors and Contractors*

### The categories of school information that we process include:

- personal information (such as name, address)
- characteristics information (DBS number, proof of identification)
- Company information (address, contact names, contact telephone numbers)
- Insurance information (liability / indemnity insurance)

### Why we collect and use visitor / contractor information

We use visitor / contractor data to:

a) ensure that pupils are safeguarded
b) monitor the performance of work undertaken by contractors and visitors
c) be able to communicate effectively with contractors and visitors in relationship to fulfilling our role as a public authority

Under the General Data Protection Regulation (GDPR), the legal basis / bases we rely on for processing personal information for general purposes are:

Article 6 lawful processing reasons

b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract

d) 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

### Collecting visitor / contractor information

We collect personal information via signing in systems, management information systems log books and the single central record.

Data are essential for the school's operational use. The personal information you provide to us is mandatory.

## Storing visitor / contractor information

We hold data securely for the set amount of time shown in our data retention schedule.

## Who we share visitor / contractor information with

We do not routinely share this information with anyone outside of the organisation.

We may be required as part of an Ofsted inspection to share information held in our single central record, detailing information relating to the safeguarding of children.

## Contact

If you would like to discuss anything in this privacy notice, please contact our Data Protection Officer:

Neil Stott

Email: gdpr@eat.uk.com

**or:**

Kirklees Council, Information Governance Team

Email: information.governance@kirklees.gov.uk
Telephone: 01484 221000

Wakefield Council Access to information - Wakefield Council

Rotherham Council - General Data Protection Regulation enquiry – Rotherham Metropolitan Borough Council

Ministerial and Public Communications Division
Department for Education Telephone: 0370 000 2288
Piccadilly Gate
Manchester
M1 2WD

Website:https://www.gov.uk/government/organisations/department-for-education
Email: http://www.education.gov.uk/help/contactus

## Appendix 5: Trustee Privacy Notice

*2024/25*

*Privacy Notice (how we use volunteers' information)*
*for*
*Members of the Board of Trustees and other volunteers*

Under data protection law, individuals have a right to be informed about how the school 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 individuals working with the school in a voluntary capacity, including members of the Management Committee..

We,(Ethos Academy Trust PRU, The Field Hill Centre, Batley Field Hill, Batley W17 0BQ), are the 'data controller' for the purposes of data protection law.

Our data protection officer is Neil Stott (see 'Contact us' below).

### The personal data we hold

We process data relating to those volunteering 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
- 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 these data

The purpose of processing this data is to support the school to:

- Establish and maintain effective governance

- Meet statutory obligations for publishing and sharing details relating to the Management Committee
- 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

## Use of your personal information for marketing purposes

Where you have given us consent to do so, Ethos Academy Trust may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you. You can withdraw consent or 'opt out' of receiving these texts and/or emails at any time by clicking on the "unsubscribe" link at the bottom of any such communication, or by contacting our data protection officer.

## Our lawful basis for using these 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:

- 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)

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 our use of your data.

## 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 these data

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

When your relationship with the school has ended, we will retain and dispose of your personal information in accordance with our record retention schedule, a copy of which is accessible from the

school's website.

## 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 trustees*
- *Our local authority – to meet our legal obligations to share certain information with it, such as details of Trustees*
- *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*
- *Police forces, courts*

## 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.

## Your rights

### How to access the 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
- 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 a 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.

## 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 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:

- 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

## 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:

Neil Stott

c/o Ethos Academy Trust
Knowles Hill Road
Dewsbury Moor
Dewsbury
WF13 4QS

Email: gdpr@eat.uk.com

## Appendix 6: Applicant Privacy Notice

*2024/25*

*Privacy Notice*

*for*

*Job Applicants*

Under data protection law, individuals have a right to be informed about how the school 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 individuals applying for jobs at our school.

We, Ethos Academy Trust PRU, are the 'data controller' for the purposes of data protection law.

Our data protection officer is Neil Stott (see 'Contact us' below).

Successful candidates should refer to our privacy notice for the school workforce for information about how their personal data is collected, stored and used. This is available from the school office.

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

## 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:

- 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)

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.

## 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 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 record retention schedule, a copy of which is available from the school 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 shortlists of candidates for a headteacher position*

- *Suppliers and service providers – to enable them to provide the service we have contracted them for, such as HR and recruitment support*

## 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.

## Your rights

### How to access the 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
- 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 a 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.

## 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 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:

- 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

## Contact us

If you would like to discuss anything in this privacy notice, please contact our Data Protection Officer:

Neil Stott

Email: gdpr@eat.uk.com

**or:**

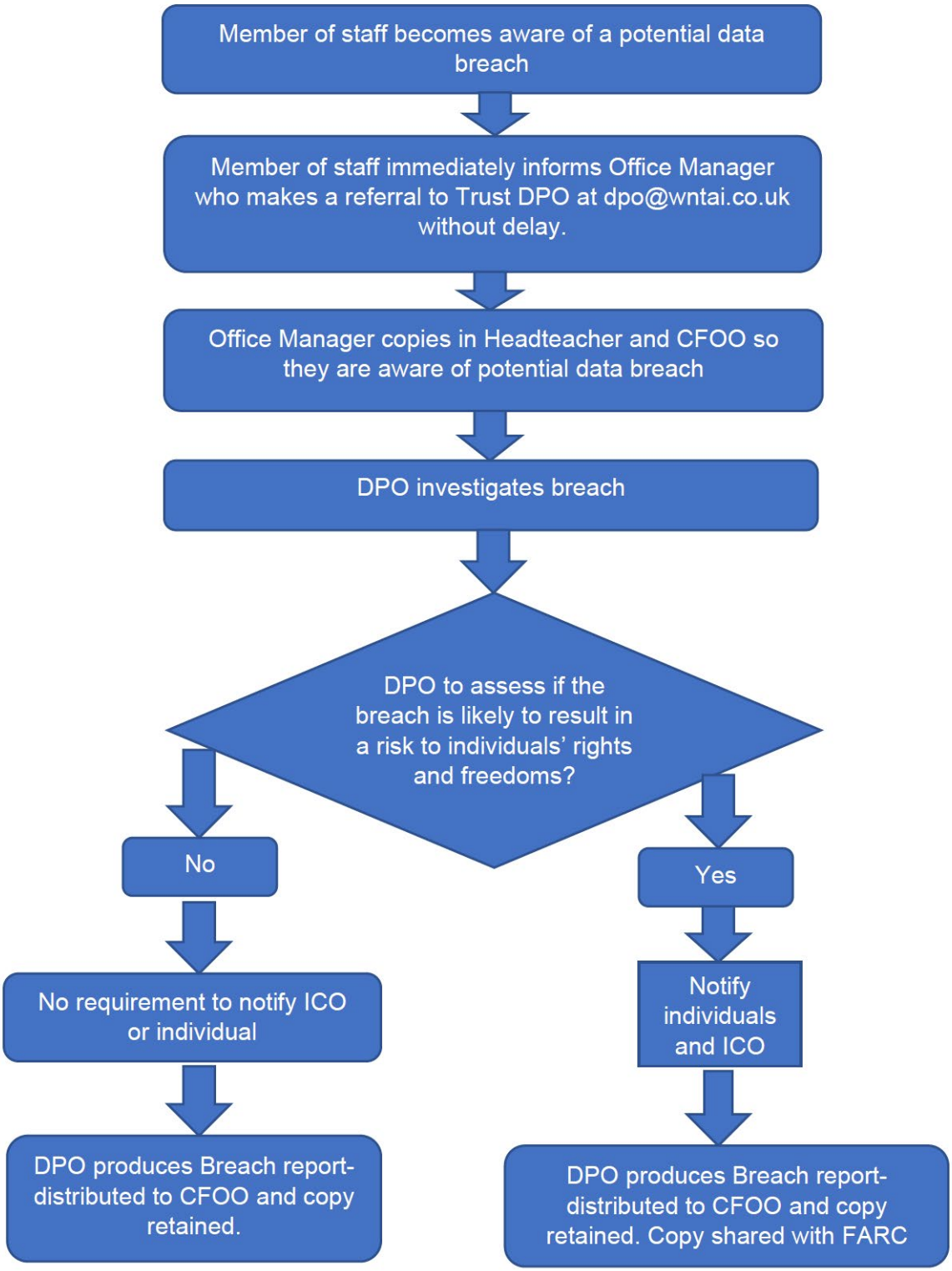
Kirklees Council, Information Governance Team

Email: information.governance@kirklees.gov.uk
Telephone: 01484 221000

Wakefield Council - Access to information - Wakefield Council

Rotherham Council - General Data Protection Regulation enquiry – Rotherham Metropolitan Borough Council

Ministerial and Public Communications Division
Department for Education Telephone: 0370 000 2288
Piccadilly Gate
Manchester
M1 2WD

Website:https://www.gov.uk/government/organisations/department-for-education
Email: http://www.education.gov.uk/help/contactus

## APPENDIX 7: Data Breach Flowchart