

United Learning – Group Policy on privacy notices for pupils and parents/carers.

Document Control	
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1. Scope

- 1.1 This Policy set out in this document applies to all United Church Schools Trust (UCST) and United Learning Trust (ULT) schools and offices. The two companies (UCST and ULT) and their subsidiaries are referred to in this policy by their trading name, 'United Learning'.
- 1.2 Where this policy refers to 'School' or 'Head Teacher', within Central Office this should be interpreted to refer to the department where a member of staff works and their Head of Department.
- 1.3 As a values-led organisation our values of ambition, confidence, creativity, respect, enthusiasm and determination are key to our purpose and underpin all that we do.

2. Definitions

The following definitions apply to this policy.

- 2.1 "GDPR" General Data Protection Regulation.
- 2.2 "Personal data" means any information relating to an identified or identifiable natural person ("data subject").
- 2.3 An "identifiable person" is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.
- 2.4 "Processing" means any operation or set of operations performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

3. Policy statement

- 3.1 Personal data must be processed lawfully, fairly and in a transparent manner. It is a requirement of the GDPR that individuals are provided with the following information when their personal data is collected:

- The identity and contact details of the Data Controller and its representative.
- The purposes for which the personal data is being collected.
- The legal basis for the processing of the personal data.
- Who the personal data may be shared with, if applicable.
- Details of any transfer of the personal data to a country outside of the EEA, which does not have an adequacy decision.

The period for which the personal data will be stored or, where that is not possible, the criteria used to determine that period



Individuals must also be informed of the existence of the following rights:

- The right to subject access.
- The right to rectification and erasure of personal data in certain circumstances.
- Where the processing is based on consent, the right to withdraw that consent.
- The right to lodge a complaint with a supervisory authority.
- Whether the data subject is obliged to provide the personal data and the consequences of failure to provide such data.
- Where applicable, the existence of automated decision making as well as the significance and envisaged consequences of such processing for the data subject.

3.2 Where United Learning intends to process the personal data for a purpose other than that for which it was originally collected United Learning will, prior to that further processing, provide the individuals concerned with information on that other purpose

3.3 If United Learning receives personal data from another Data Controller it will provide the individuals concerned with the above information within one month of receipt of the data.

4. Procedure

4.1 United Learning will use a layered privacy notice approach to provide individuals with the above information. All privacy notices will be concise, transparent, written in plain language and free of charge.

4.2 All forms used to collect personal data including forms embedded in a website will contain basic privacy information and will refer to a more detailed privacy notice (appendix B) which must be available on the school website and in paper form from the school office. Where the legal basis for processing the personal data will be consent schools must follow the guidance in appendix A and comply with the policy for obtaining and recording consent

4.3 Privacy statements will be updated whenever any of the information covered by the statement changes. Template privacy statements will be reviewed by the Information Governance Steering Committee on an annual basis to ensure that they are accurate and up to date. Data Protection Leads are responsible for ensuring school notices are updated in line with this review and that the notice is approved by the LGB.

4.4 Websites must also have a website specific privacy notice detailing what personal data is captured by the website and any applicable cookie information.

