PRIVACY NOTICE

TRUSTEES, LOCAL STAKEHOLDERS AND OTHER VOLUNTEERS

THE PEGASUS PARTNERSHIP TRUST

"Children First"

Our Vision Statement

Within The Pegasus Partnership Trust, our vision and aims of education are underpinned by the UNICEF United Nations Conventions on the Rights of the Child (UNCRC).

We believe:

- All learning should be purposeful and experiential
- In learning values and skills for whatever the future brings
- We can be world changers

We are a PRIMARY MAT for PRIMARY SCHOOLS so every child's PRIMARY EXPERIENCE enables lifelong learning

This means we are committed to providing an education, for all pupils, that should develop their personality, talents and abilities to the full (article 29). We encourage a sense of community spirit, where pupils pastoral care and well-being underpins academic, co-curricular and sporting excellence. We aim to achieve this through an inspiring curriculum, that is child-centred (article 3), and extends pupil learning beyond the constraints of the classroom. We want to instil a life-long love of learning and equip pupils with skills that develop their independence, critical thinking, self-awareness, resilience and self-confidence.

Statement of intent

The Pegasus Partnership Trust aims to ensure that all personal data collected about staff, pupils, parents, governors, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the expected provisions of the Data Protection Act 2018 (DPA 2018) as set out in the Data Protection Bill.

The school may, from time to time, be required to share personal information about its staff or pupils with other organisations, mainly the LA, other schools and educational bodies, and potentially social services. This policy applies to all personal data, regardless of whether it is in paper or electronic format.

Safeguarding Statement

The Pegasus Partnership Trust respects and values all children and are committed to providing a caring, friendly and safe environment for all our pupils so they can learn, in a relaxed and secure atmosphere (article 31). We believe every pupil should be able to participate in all school activities in an enjoyable and safe environment and be protected from harm (article 19). This is the responsibility of every adult employed by, or invited to deliver services to schools within the Trust. We recognise our responsibility to safeguard all who access school and promote the welfare of all our pupils by protecting them from physical, sexual and emotional abuse, neglect and bullying.

Equality Statement

At The Pegasus Partnership Trust, we ensure equality of education and opportunity for all pupils, staff, parents and carers receiving services from the school, irrespective of age, race, gender (re-assignment), disability (article 23), religion and belief (article 14), sexual orientation, marital/cohabiting status or socio-economic background (article 2). We develop a culture of inclusion and diversity in which all those connected to the school feel proud of their identity and able to participate fully in school life.

The achievement of pupils is monitored by race, gender and disability and we use this data to support pupils, raise standards and ensure inclusive teaching. We tackle discrimination by the positive promotion of equality, challenging bullying and stereotypes and creating an environment

which champions respect for all. We believe that diversity is a strength, which should be respected and celebrated by all those who learn, teach and visit here.

Contents

1. Introduction 3
2. The personal data we hold 3
3. Why we use this data 4
4. Our lawful basis for using this data 4
5. Collecting this data.....6
6. How we store this data 6
7. Who we share data with 6
8. Your rights 7
9. Complaints.....8
10. Contact us .....**Error! Bookmark not defined.**

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1. Introduction

Under data protection law, individuals have a right to be informed about how our 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 **visitors to the school**.

Our school, The Welldon Park Academy, Wyvenhoe Road, South Harrow, HA2 8LS is the 'data controller' for the purposes of data protection law.

Our data protection officer is Mark Alwyn (see 'Contact us' below).

2. 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
- References
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Information about any health conditions you have that we need to be aware of
- Information about disability and access requirements

- Photographs and CCTV images captured in school

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

3. Why we use this data

We use the data listed above to:

a) Establish and maintain effective governance

b) Meet statutory obligations for publishing and sharing trustees' details

c) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils

d) Undertake equalities monitoring

e) Ensure that appropriate access arrangements can be provided for volunteers who require them

3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we 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 us (see 'Contact us' below).

3.2 Use of your personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

4. Our lawful basis for using this data

We will only collect and use your information when the law allows us to. We need to establish a 'lawful basis' to do this. Our lawful bases for processing your personal information for the reasons listed in section 3 above are:

We will only lawfully process data to the extent that at least one of the following applies:

a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;

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;

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

d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;

e) 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;

f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Where you've provided us with consent to use your information, you may take back this consent at any time. We'll make this clear when requesting your consent, and explain how you'd go about withdrawing consent if you want to.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting this data

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.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

All maintained school governing bodies, under section 538 of the Education Act 1996 and academy trusts, under the Academies Financial Handbook have a legal duty to provide the governance information as detailed above.

6. How we store this data

We keep personal information about you while you volunteer at our school. We may also keep it beyond your work at our school if this is necessary. Our Data Retention Policy sets out how long we keep information about Trustees, LSGs and other volunteers and is available on our website.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

7. Who we share data with

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 (where applicable)
- the Department for Education (DfE). We are required to share information about individuals in governance roles with the (DfE) under the requirements set out in the Academies Financial Handbook

All data is entered manually on the GIAS system and held by DfE under a combination of software and hardware controls which meet the current government security policy framework.

For more information, please see 'How Government uses your data' section.

We do not share information about individuals in governance roles with anyone without consent unless the law and our policies allow us to do so.

7.1 Transferring data internationally

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

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

8. Your rights

8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- 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 us (see 'Contact us' below).

8.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge 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
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

9. 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.

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

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

10. 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**:

- The DPO Centre Ltd, 50 Liverpool Street, London, EC2M 7PY. 020 3797 1289.

However, our **data protection lead** has day-to-day responsibility for data protection issues in our school.

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

- Mark Alwyn, Estates Director, The Welldon Park Academy, Wyvenhoe Road, South Harrow, HA2 8LS. 020 8864 9378. DPO@theppt.co.uk