



## FAIR PROCESSING NOTICE (PRIVACY NOTICE)

Reference No	FPN
Date Reviewed:	December 2020

**TOGETHER WE EMPOWER EXCELLENCE**

## Our contact details

**Name:** Learning Academy Partnership (South West)

**Address:** Suite 4 Zealley House, Greenhill Way, Kingsteignton, TQ12 3SB

**Telephone:** 01626 248800

**E-mail:** [partners@lapsw.org](mailto:partners@lapsw.org)

**Website:** [www.lapsw.co.uk](http://www.lapsw.co.uk)

**Information Commissioner's Office Registration Number:** ZA237570

## The type of personal information we collect

We may collect the following types of personal information (please note this list does not include every type of personal information and may be updated from time to time):

- admissions
- attainment (school work, marks and exam results)
- attendance (such as sessions attendance and absences)
- behaviour
- exclusions
- catering and free school meal management
- trips and activities (permission and attendance)
- medical information and administration
- safeguarding and special educational needs (such as referral and assessment information)
- personal identifiers, contacts and characteristics (such as name, unique pupil numbers, contact details)
- identity management/authentication
- personal characteristics, such as:
  - nationality and ethnic group;
  - religion;
  - first-language;
  - any relevant protected characteristics.
- employees' qualifications and contractual information, such as:
  - right to work information;
  - employee position and/or role;
  - salary;
  - employment start date;
  - remuneration details (including national insurance and other financial details).

Special categories of data means personal information revealing:

- racial or ethnic origin;
- political opinions; religious or philosophical beliefs or trade union membership;
- genetic or biometric data that uniquely identifies you;
- data concerning your health, sex life or sexual orientation.

We do not process any special categories of personal information except where necessary for reasons of substantial public interest in complying with legal obligations including under the Equality Act 2010 or where necessary to protect the vital interests of the Data Subject or of another natural person and where safeguards are in place to ensure that this personal information is kept secure. For the avoidance of doubt, where special categories of personal information are collected it shall not be used for the purposes of automated decision making and/or profiling.

## How we get personal information and why we have it

Most of the personal information we process is provided to us directly by you, for example through a school admissions application or job application. Whilst the majority of the personal information we are provided with, or collect, is mandatory, some of it is provided to us on a voluntary basis. We will inform you whether you are required to provide certain information to us or if you have a choice in this.

We use the information that you have given us in order to:

- **to support our pupils' learning:** we will process personal information to help every child achieve his or her potential in all areas of learning and to promote excellence in our teaching and learning environment.
- **monitor and report on their progress:** we will process personal information to record pupils' progress to help set and monitor targets and boost achievements and aspirations of all pupils.
- **provide appropriate pastoral care:** we will process personal information to ensure that all pupils are properly supported in their time with us, and to help staff understand and respond to the unique circumstances of all pupils.
- **assess the quality of our services:** we will process personal information so that we may reflect on our own practices to help us improve and provide the highest quality education that we can to all pupils.
- **to ensure proper management of school trips and afterschool clubs and activities:** when pupils and parents participate in school trips and afterschool clubs and activities personal information will need to be processed.
- **to promote and protect health and safety:** in order to protect pupils, parents and staff in their involvement at the Trust, we must process personal information relating to matters such as incidents and responses to incidents.
- **to enable individuals to be paid:** to assist in the running of the Trust and to enable individuals to be paid, we will process personal information of those employed by the Trust.
- **to assist with the continuing development of our recruitment and retention policies and practices:** to enable us to better our recruitment and retention policies and practices, we will process personal information of those currently employed by the Trust.
- **to develop our understanding of our workforce and how employees are deployed:** to help us create a fully informed, comprehensive picture of the make-up of our workforce and how each employee is utilised as a member of our workforce, we will process personal information of those employed by the Trust.

Personal information will be accessible by members of staff. Where necessary, volunteers, trustees and local committees will also have access to personal data.

We will not share information about our pupils with third parties without consent unless we are required to do so by law or our policies. This may include our Local Authority, the Department for Education (DfE) (please see below), the Police and other organisations where necessary; for example, for the purposes of organising a school trip or otherwise enabling students to access services or for the purposes of examination entry. Information may also be sent to other schools where necessary; for example, schools that pupils attend after leaving us.

Certain data collection obligations are placed on us by the Department for Education (DfE). To find out more about the data collection requirements placed on us by the DfE (for example; via the school census) visit: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Much of the data about pupils in England is held by the DfE in the National Pupil Database. It is stored in electronic format for statistical purposes. The information is used by the DfE for longitudinal studies of educational performance and by the Education and Skills Funding Agency (ESFA) to determine funding.

<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

We may share personal information with the following organisations to enable them to process data on our behalf. We ensure these third party suppliers are compliant with Data Protection laws and specify their obligations in written contracts.:

- 3P Learning (Mathletics)
- A & B Psychologists
- Babcock LDP (CPD and Outdoor Education)
- Browne Jacobson LLP
- Companies House
- Computeam
- Cool Milk at School Ltd
- Cornwall Council
- CPOMS Systems Limited
- Devon County Council (Admissions, FSM and Audit)
- Department for Education
- Devon Norse
- Edenred
- Exeter Diocesan Board of Finance Limited
- Facebook
- Family ApS
- FFT Education Ltd
- Fig Leaf Group (Maths No Problem!)
- Google (G Suite for Education)
- Health & Safety Executive
- Hootsuite
- Iris Financials (Financials Suite, PS People, Iris Analytics and Iris Engage)
- Jelly Images
- JJES Education Services Ltd
- LinkedIn
- Lloyds Bank plc
- Lucent
- Maths Circle Ltd (TTRockstars)
- Medigold Health
- Nuffield Foundation
- One Team Logic Limited (MyConcern)
- Oxford University Press (My Maths / Phonics / Spelling)
- Pearson UK (Active Learn)Peninsula Pensions
- PHP Law LLP
- Plymouth Marjon University
- Premier Education Ltd (Premier Sport)
- Renaissance Learning UK Ltd (Accelerated Reader)
- RM Education
- Ruth Miskin Training
- Sandgate Systems Ltd (Every)
- School Business Services
- Scomis (SIMS)
- Smart Payments Ltd (School Money)
- SMART Technologies ULC
- South Dartmoor Academy
- Spiceworks
- Teachers' Pensions
- Teachers2Parents Ltd
- Tempest Photography
- The Foundation Stage Forum Ltd (Tapestry)
- The Key
- The Spires College
- Thompson Jenner
- Torbay Council (Admissions, FSM and Occupational Health)
- Torbay Development Agency
- Torquay United Sports Trust
- Twitter
- UCAS
- Virgin Care Services Ltd (School Nurse Team)
- Wonde

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

**(a) Your consent.** Personal information, including special categories, may be collected and/or processed where consent has been given (for example, school/staff photographs for non-educational purposes). You are able to remove your consent at any time and you can do this by contacting the school/Trust office.

**(b) We have a contractual obligation:** We collect and process employees personal information which is necessary for the performance of a contract of employment 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. Personal information will also be collected and processed for the purposes of relevant contracts for the provision of services which are paid for. This may include but is not limited to the provision of music tuition; school trips; entering students for examinations.

**(c) We have a legal obligation:** We must collect and process personal information in order to provide education in accordance with statute law (such as the Education Act 1996 and other legislation), our funding agreements with the Secretary of State, our memorandum and articles of association and other guidance provided for in law.

**(d) We need it to perform a public task:** We process personal information where processing is necessary for the performance of tasks carried out in the public interest. It is in the public interest to provide educational services to our pupils and to offer extra-curricular activities such as reading sessions and afterschool clubs to benefit the personal and academic growth of our pupils.

## How we store your personal information

Paper copies of your information are securely stored at the Trust schools and offices; for example, in secure filing cabinets.

Electronic copies of your information are securely stored on Trust servers and information will only be processed where we are satisfied that it is reasonably secure.

All information you provide to us is stored on secure servers. When giving personal information to third parties (for example, software providers) it is possible that this personal information could be stored in a location outside of the European Economic Area. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this privacy notice. In particular, any transfer of your personal information made by us to a location outside of the EEA will be governed by clauses in a written contract in order to keep these secure.

We will only keep your information for as long as is necessary to achieve the purposes for which they were originally collected. As a general rule, personal information will be kept for the entire period that a child is a pupil at the Trust, or an employee is employed at the Trust. Other records (for example, safeguarding or in relation to special educational needs) will be kept for longer in accordance with our Records Management and Retention Policy. Further information on retention periods can be obtained by contacting us via the details above.

Once the retention period concludes the information is securely and safely destroyed/ deleted.

## Your data protection rights

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us via the school office or you can contact our Data Protection Officer [dpo@lapsw.org](mailto:dpo@lapsw.org) or telephone 01626 248793 if you wish to make a request.

## How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Mrs Rayner, Data Protection Officer  
Learning Academy Partnership  
Suite 4 Zealley House  
Greenhill Way  
Kingsteignton  
TQ12 3SB

Email: [dpo@lapsw.org](mailto:dpo@lapsw.org)

Website: [www.lapsw.co.uk/gdpr](http://www.lapsw.co.uk/gdpr)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

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

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>