



Privacy Notice: Alumni

March 2023

Privacy Notice: Alumni

Under data protection law, individuals have a right to be informed about how the Trust 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 alumni of the Trust, in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Severn Academies Educational Trust (SAET), is the 'data controller' for the purposes of data protection law. **Our data protection officer is Jenny Lane** (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:

- Name
- Previous names
- Contact details
- Details about your time at the Trust, including records of your achievements and interests
- Photographs of your time at the Trust
- Details of your experience, career and employers since you left the Trust
- Records of contributions you have made to the Trust since leaving, such as your time, expertise or money
- Records of how you have engaged with our alumni network, including emails you have opened, events attended, mailing lists you have signed up to and any other interactions
- Information required to manage your attendance at alumni events, including access arrangements and dietary requirements (which could amount to 'special category' personal data, which is more sensitive)
- Bank details and other financial information, if you make any payments to the Trust
- Records associated with Gift Aid claims on donations

Some of the information collected is called "special category personal data" (for example disability information to assist with site access, dietary requirements for special events). We will take extra care to make sure that this is kept safe.

Why we collect and use this data

We use this data to:

- Help us build a community around the Trust
- Offer enrichment and career development opportunities to current pupils
- Raise extra money so that we can continue to improve the experience pupils get from the Trust
- Notify you of alumni events you may be interested in
- Keep you up to date with Trust news
- Help us promote the Trust
- Keep you safe and comfortable while attending alumni events
- Tailor the communications we send to you, to ensure they are appropriate and relevant

Use of your personal information for marketing purposes

Where you have given us consent to do so, SAET may send you marketing information by email or text promoting Trust 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.

Privacy Notice: Alumni

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

We only collect and use your personal data when the law allows us to. Most commonly, we process it where we have obtained explicit consent to use it in a certain way, and where we have legitimate interests in processing the data.

Consent (Article 6, 1b UK GDPR) – if we rely on this basis, we will be clear so you know that you have the choice to consent (or not) for us to use your data

Where we have obtained consent, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how to withdraw it.

Legitimate Interest (Article 6(1)(f) UK GDPR) - where we have legitimate interests in processing your data, we will carry out a 'balancing test' to make sure our processing does not infringe your interests, rights and freedoms. We will only use the data in ways that you would reasonably expect.

The legitimate interests we have are:

- Asking you for financial contributions towards the Trust, and facilitating this efficiently
- Analysing the composition of our alumni group to help us decide what events or activities to run
- Providing you with paper-based marketing communications based on what we think you'll be interested in

Contract (Article 6, 1c UK GDPR) - we will also use your data in order to fulfil the terms of any contractual arrangements we may have with you e.g. bookings for events.

Legal Obligation (Article 6, 1c UK GDPR) - we may process your personal data in order to comply with our legal obligations, such as our accounting and reporting requirements in relation to any donations received, and complying with our duties under equality legislation.

Less commonly, we may process alumni personal data for the following lawful reasons:

Public Interest (Article 6, 1e UK GDPR) – where the use of your data is necessary to permit us to carry out a task in the public interest (SAET's public interest is to provide an education)

Vital Interests (Article 6, 1d UK GDPR) – where the use of your data is necessary to protect life, such as sharing personal data with emergency services

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.

In addition, when processing special category personal data, we rely on Article 9 of UK GDPR:

Explicit Consent (Article 9, 2a UK GDPR) – where you have given us permission to process your data

Health or Social Care (Article 9, 2h, Schedule 1 part 1 paragraph 2 (2) UK GDPR) – where we need to use your data for health and social care, for example special dietary requirements, first aid or to support your wellbeing

Privacy Notice: Alumni

Substantial Public Interest (Article 9, 2g UK GDPR and, Part 2 of Schedule 1, 8 and 18 of the DPA 2018) – to provide you with equal opportunities and treatment (8) and to fulfil our safeguarding responsibilities

Vital Interests (Article 9, 2c UK GDPR) – to protect your life, such as sharing information with the emergency services

Some of the information we collect from you is mandatory, and in some cases you can choose whether or not to provide the information 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.

We will only collect the data that we need in order to fulfil our purposes, which are set out above.

How we store this data

We will keep your personal data while you remain involved in our alumni network. We may also keep it beyond this, if necessary, to comply with our legal obligations.

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.

Our record retention schedule sets out how long we keep information about alumni.

Personal data we collect as part of the job application process is stored in line with our record retention schedule. When it is no longer required, we will delete your information in accordance with our record retention schedule.

To request a copy of the retention schedule email: office@saet.co.uk

Data sharing

We do not share information about alumni 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 alumni with:

- Our local authority – to meet our legal duties to share certain information with it, such as safeguarding concerns
- Education and Skills Funding Agency to meet our legal obligations to share certain information with it such as SAET's audited accounts and other annual returns
- Our regulator Ofsted, to assist with the inspection and assessment of the quality of education provision
- Our auditors to meet our legal obligation in allowing access to our records to test the rigour and compliance of our financial management processes
- Occasionally and when necessary internal and external auditors or regulators
- The Charity Commission – for compliance with charity law;
- HMRC - as required for Gift Aid purposes; and
- Survey and research organisations
- Charities and voluntary organisations
- Third parties engaged by SAET to provide alumni, supporter and fundraising related services – we may share biographical, contact and education details, professional details, volunteering and philanthropic details;
- Event venue providers – names and accessibility and assistance requirements and related information;

Privacy Notice: Alumni

- Police forces, courts, tribunals to meet our legal obligations to share certain information, such as if a person has been suspected of being involved in or the victim of criminal activity.

Your Rights

How to access the personal information we hold about you

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, liaise with your school / setting contact.

You also have the right to:

- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

You may also have a right for your personal information to be transmitted electronically to another organisation in certain circumstances.

We aim to respond to Subject Access Requests within one month but during school holidays this may become more difficult.

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please liaise with your school / setting contact.

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

Privacy Notice: Alumni

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**:

- FAO Jenny Lane - The DPO at dpo@saet.co.uk or telephone 01562 542574

Write to:

Data Protection Officer
Severn Academies Educational Trust
Wyre Forest House
Fine Point Way
Kidderminster
Worcestershire
DY11 7WF

This notice is based on the [Department for Education's model privacy notices](#), amended for alumni and to reflect the way we use data in this Trust.



Privacy Notice: Job Applicants (Non-Religious)

March 2023

Privacy Notice: Job Applicants – Non-Religious

Under data protection law, individuals have a right to be informed about how the Trust 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 Trust.

Severn Academies Educational Trust (SAET), is the 'data controller' for the purposes of data protection law. **Our data protection officer is Jenny Lane** (see 'Contact us' below).

Successful candidates should refer to our privacy notice for staff for information about how their personal data is collected, stored and used.

The personal data we hold

We process data relating to those applying to work at our Trust. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Characteristics information (such as gender, age, ethnic group)
- 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

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

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

- Legal obligation (Article 6, 1c UK GDPR) e.g. safer recruitment, as part of our safeguarding obligations
- Public Interest (Article 6, 1e UK GDPR) – where the use of your data is necessary to permit us to carry out a task in the public interest (SAET's public interest is to provide an education)

Less commonly:

- Consent (Article 6, 1b UK GDPR) – where you have provided us with consent to use your data, you may withdraw this consent at any time, if we rely on this basis, we will be clear so you know that you have the choice to consent (or not) for us to use your data.
- Vital Interests (Article 6, 1d UK GDPR) – where the use of personal data is necessary to protect life, such as sharing personal data with emergency services

Privacy Notice: Job Applicants – Non-Religious

- Legitimate Interest (Article 6(1)(f) UK GDPR) - where we have legitimate interests in processing your data, such as sending out paper based marketing information, we will carry out a 'balancing test' to make sure our processing does not infringe your interests, rights and freedoms. We will only use the data in ways that you would reasonably expect.

In addition, when processing special category personal data, we rely on Article 9 of UK GDPR:

- Substantial Public Interest (Article 9, 2g UK GDPR and, Part 2 of Schedule 1, 8 and 18 of the DPA 2018) – to provide you with equal opportunities and treatment (8) and to fulfil our safeguarding responsibilities
- Explicit Consent (Article 9, 2a UK GDPR) – where you have given us permission to process your data
- Employment, social security and social protection law (Article 9, 2b UK GDPR) – to fulfil our legal obligations relating to safer recruitment

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 Trust'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 record retention schedule. 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.

When it is no longer required, we will delete your information in accordance with our record retention schedule.

To request a copy of the retention schedule email: office@saet.co.uk

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:

- Trade unions and associations to facilitate their role in supporting the workforce
- Suppliers and service providers – to enable them to provide the service we have contracted them for e.g. HR services and recruitment support
- Employment and recruitment agencies used from time to time to support the recruitment process

Privacy Notice: Job Applicants – Non–Religious

- Professional advisers and consultants used from time to time to support the recruitment process
- Police forces, courts, tribunals to meet our legal obligations to share certain information, such as if a person has been suspected of being involved in or the victim of criminal activity
- Ofsted – to evidence the Trust’s recruitment process and equal opportunity, in accordance with School Staffing (England) Regulations 2009 and the Equality Act 2010.

Transferring data internationally

Should we transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law.

Your Rights

Requesting access to your personal data

Under data protection legislation, you have the right to request access to your personal information that we hold. To make a request for your personal information, liaise with your school / setting contact.

You also have the right to:

- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

You may also have a right for your personal information to be transmitted electronically to another organisation in certain circumstances.

We aim to respond to Subject Access Requests within one month but during school holidays this may become more difficult.

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please liaise with your school / setting contact.

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

Privacy Notice: Job Applicants – Non–Religious

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:

- FAO Jenny Lane - The DPO at dpo@saet.co.uk or telephone 01562 542574

Write to:

Data Protection Officer
Severn Academies Educational Trust
Wyre Forest House
Fine Point Way
Kidderminster
Worcestershire
DY11 7WF

This notice is based on the [Department for Education's model privacy notice](#), amended for job applicants to reflect the way we use data in this Trust.



**Privacy Notice:
Parents & Carers
(use of their Child's Data)**

March 2023

Privacy Notice: Parents/Carers – Use of their Child's data

Under data protection law, individuals have a right to be informed about how the Trust 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 **students**.

Severn Academies Educational Trust (SAET), is the 'data controller' for the purposes of data protection law. **Our data protection officer is Jenny Lane** (see 'Contact us' below).

The personal data we hold

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

- Personal identifiers and contacts (such as name, unique pupil number, contact details, and address)
- Test results
- Attendance records
- Characteristics (such as ethnicity, language, free school meal eligibility)
- Special educational needs (including the needs and ranking)
- Medical and administration (such as doctors information, child health and wellbeing, dental health, allergies, medication and dietary requirements)
- Attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Assessment and attainment (such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
- Behavioural information (such as rewards, exclusions, and any relevant alternative provision put in place)
- Biometrics (used to access school meals and resources from the school library)
- Photographs and videos taken whilst engaged in school activities (used, for example, to evidence learning, for identification, on school displays, for school communications and publicity)
- CCTV images (to maintain safe and secure school sites)
- Safeguarding information to look after you and keep you safe (such as court orders and professional involvement)

We may also hold data about students that we have received from other organisations, including other schools, local authorities and the Department for Education.

We may also collect, store and use information about your child that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race
- Ethnic origin
- Religion
- Biometrics (where used for ID purposes)
- Health including physical and emotional well-being

Why we collect and use this data

We collect and use student information, for the following purposes:

- a) to support student learning
- b) to monitor and report on student attainment progress
- c) to provide appropriate pastoral care
- d) to celebrate success
- e) to assess the quality of our services

Privacy Notice: Parents/Carers – Use of their Child’s data

- f) to keep children safe (food allergies, emergency contact details, health and wellbeing information)
- g) to meet the statutory duties placed upon us for the Department for Education (DfE) data collections

Under the UK General Data Protection Regulation (UK GDPR), the main lawful basis we rely on for processing student information is:

Public Interest (Article 6, 1e UK GDPR) – where we using the data is necessary to permit us to carry out a task in the public interest (SAET’s public interest is to provide an education)

We also rely on other lawful bases, which are:

Legal Obligation (Article 6, 1c UK GDPR) – where the use of data is necessary to permit the school to comply with the law, such as our duty to safeguard students

Consent (Article 6, 1b UK GDPR) – if we rely on this basis, we will be clear that there is a choice to consent (or not) for us to use the data

Vital Interests (Article 6, 1d UK GDPR) – where the use of data is necessary to protect life, such as sharing personal data with emergency services

Where we have obtained consent to use students’ personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using personal data overlap, and there may be several bases we rely on to use this information.

In addition, when processing special category personal data, we rely on Article 9 of UK GDPR:

Explicit Consent (Article 9, 2a UK GDPR) – where permission has been given to process the data
Health or Social Care (Article 9, 2h, Schedule 1 part 1 paragraph 2 (2) UK GDPR) – where we need to use the data for health and social care, for example special dietary requirements, first aid or to support student wellbeing

Legal Claims or Judicial Acts (Article 9, 2f UK GDPR) – there may also be circumstances where we need to personal data in relation to legal matters

Substantial Public Interest (Article 9, 2g UK GDPR and, Part 2 of Schedule 1, 8 and 18 of the DPA 2018) – to provide equal opportunities and treatment to our students (8) and to fulfil our safeguarding responsibilities

Vital Interests (Article 9, 2c UK GDPR) – to protect life, such as sharing information with the emergency services

Collecting this information

We collect student information via registration forms at the start of the school year or Common Transfer File (CTF) or secure file transfer from previous school

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

Privacy Notice: Parents/Carers – Use of their Child’s data

How we store this data

We keep personal information about students while they are attending our schools. We create and maintain a student file for each child. The information is kept securely in electronic and hard copy formats and is only used for purposes directly relevant to your child’s educational and welfare needs.

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

We may also keep it beyond their attendance at our Trust if this is necessary in order to comply with our legal obligations. Our record retention schedule sets out how long we keep information about students. After the retention period has elapsed, all data will be destroyed securely.

To request a copy of the retention schedule email: office@saet.co.uk

Data sharing

We do not share information about students 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 students with:

- Our local authority – to meet our legal duties to share certain information with it, such as concerns about students’ safety and exclusions
- The Department for Education to meet our legal obligations to share certain information with it, such as census collections and statutory assessment information
- Schools / Multi-Academy Trusts e.g. transferring files if a child moves school
- The student’s family and representatives such as progress and attainment reporting
- Educators and examining bodies to meet our legal obligations to share such information as assessment or moderation information and the transfer of student files should the student relocate to another school
- Education software systems, this may include systems to help students practice timetables and spelling, to help with homework or revision in GCSE subjects or to view reward points earned at school. These systems relate to our public task to provide an education. If there’s a preference to do these activities without using the systems your child’s school has put in place, please let the school know and we will arrange an alternative;
- Our regulator Ofsted, to assist with the inspection and assessment of the quality of education provision
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Our auditors to meet our legal obligation in allowing access to our records to test the rigour and compliance of our financial management processes
- Health and social welfare organisations to meet our legal obligations to share certain information with it, such as where the parent, carer or legal guardian or the Trust has requested an Education Health Care Plan (EHCP) or where there are health concerns related to safeguarding or where emergency services are required
- Professional advisers and consultants such as where advice is sought from Behaviour Support Teams or the Educational Psychology Service in meeting our legal obligation and fulfil our official function
- Charities and voluntary organisations - sharing of certain information such as when using a counselling or mentoring service for a child so as to fulfil our official function.
- Police forces, courts, tribunals to meet our legal obligations to share certain information with it, such as if a child or young person has been suspected of being involved in or the victim of criminal activity

Privacy Notice: Parents/Carers – Use of their Child’s data

- Central and local government to enable them to place a student who has been permanently excluded
- Youth support services (for those students age 13 plus)

Department for Education (DfE)

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our students with the DfE either directly or via our local authority for the purpose of those data collections, such as the school census, under Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

Some of this information is then stored in the [National Pupil Database](#), which is managed by the DfE and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

The DfE may share information from the database with other organisations which promote children’s education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

You can find more information about this on the DfE’s webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) if you have any questions about the database.

Youth support services

Once our students reach the age of 13, we are legally required to pass on certain information about them to Worcestershire County Council, as it has legal responsibilities regarding the education or training of 13 -19 year olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Parents/Carers, or students once aged 16 or over, can contact our data protection officer to request that we only pass the individual’s name, address and date of birth to Worcestershire County Council.

Transferring data internationally

Should we transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law.

Requesting access to your personal data

Under data protection legislation, parents and students have the right to request access to information about them that we hold. Parents/carers can make a request with respect to their child’s data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

To make a request, contact your school setting.

Parents/carers of students within the Trust do not have an automatic right to access their child’s educational record. SAET will respond to such requests in accordance with other Subject Access Requests.

Privacy Notice: Parents/Carers – Use of their Child’s data

You also have the right to:

- to have your child’s personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your child’s personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on your child

We aim to respond to Subject Access Requests within one month but during school holidays this may become more difficult.

Where we are processing your child’s personal data with consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your child’s personal data, please liaise with your school / setting contact.

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
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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**:

- FAO Jenny Lane - The DPO at dpo@saet.co.uk or telephone 01562 542574

Write to:

Data Protection Officer
Severn Academies Educational Trust
Wyre Forest House
Fine Point Way
Kidderminster
Worcestershire
DY11 7WF

This notice is based on the [Department for Education’s model privacy notice](#) for pupils amended for parents and to reflect the way we use data in this Trust.



Privacy Notice: SCITT Trainees

March 2023

Privacy Notice: SCITT TRAINEES

Under data protection law, individuals have a right to be informed about how Stourport SCITT and the Trust 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 train as teachers within Stourport SCITT, our Partner Schools and our Trust.

Severn Academies Educational Trust (SAET), is the 'data controller' for the purposes of data protection law. **Our data protection officer is Jenny Lane** (see 'Contact us' below).

The personal data we hold

We process data relating to those we train as teachers within Stourport SCITT, our Partner Schools and in our Trust. 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
- Bank account details, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, disclosure and barring checks, 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, timetables, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving license
- Photographs
- CCTV footage
- Data about your use of the Trust'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
- Biometrics (where used for ID purposes)
- 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 SCITT, including to:

- Enable you to be paid your bursary – if applicable
- Support trainee well-being
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Allow better financial modelling and planning
- Declaration of interest to uphold the principle of public office - honesty
- Enable equalities monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

Privacy Notice: SCITT TRAINEES

Use of your personal information for marketing purposes

Where you have given us consent to do so, SAET may send you marketing information by email or text promoting Trust 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.

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

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

- Contract (Article 6 1b UK GDPR) – where we need to fulfil a contract we have entered into with you
- Legal Obligation (Article 6, 1c UK GDPR) – such as safer recruitment, as part of our safeguarding obligations
- Public Interest (Article 6, 1e UK GDPR) – where we using the data is necessary to permit us to carry out a task in the public interest (SAET's public interest is to provide an education)

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

- Consent (Article 6, 1b UK GDPR) – where you have provided us with consent to use your data, you may withdraw this consent at any time, if we rely on this basis, we will be clear so you know that you have the choice to consent (or not) for us to use your data.
- Vital Interests (Article 6, 1d UK GDPR) – where the use of personal data is necessary to protect life, such as sharing personal data with emergency services
- Legitimate Interest (Article 6(1)(f) UK GDPR) - where we have legitimate interests in processing your data, such as sending out paper based marketing information, we will carry out a 'balancing test' to make sure our processing does not infringe your interests, rights and freedoms. We will only use the data in ways that you would reasonably expect.

In addition, when processing special category personal data, we rely on Article 9 of UK GDPR:

- Substantial Public Interest (Article 9, 2g UK GDPR and, Part 2 of Schedule 1, 8 and 18 of the DPA 2018) – to provide you with equal opportunities and treatment (8) and to fulfil our safeguarding responsibilities
- Explicit Consent (Article 9, 2a UK GDPR) – where you have given us permission to process your data
- Employment, social security and social protection law (Article 9, 2b UK GDPR) – to fulfil our legal obligations relating to safer recruitment

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 Trust'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.

Privacy Notice: SCITT TRAINEES

How we store this data

Personal data is stored in line with our retention schedule. We create and maintain a file for each trainee. The information contained in this file is kept secure and is only used for purposes directly relevant to your teacher training.

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.

Once your training with us has ended, we will retain this file and delete the information in it in accordance with our record retention schedule.

To request a copy of the retention schedule email: office@saet.co.uk

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 duties to share certain information with it, such as safeguarding concerns
- The Department for Education to meet our legal obligations to create and maintain records about your teacher training and qualified teaching status and enable any bursary payments
- Birmingham City University as our provider of PGCE
- Our partner schools (as referenced in the SCITT Handbook)
- Student Finance – if applicable
- Your family and representatives in an emergency situation
- Educators and examining bodies to meet our legal obligations to share information relating to the administration of examinations
- Our regulator Ofsted, to assist with the inspection and assessment of the quality of Initial Teacher Training (ITT) provision
- Central and local government to facilitate information to them about the school workforce census
- Health and Social welfare organisations to provide support to your training where occupational health might need to be arranged
- Trade unions and associations to facilitate their role in supporting your training
- Suppliers and service providers – to enable them to provide the service we have contracted them for e.g. payroll and HR services, cashless catering
- Professional bodies e.g. pension regulators
- Our auditors to meet our legal obligation in allowing access to our records to test the rigour and compliance of our financial management processes
- Professional advisers and consultants in fulfilling our official function to support school improvement
- Police forces, courts, tribunals to meet our legal obligations to share certain information, such as if a person has been suspected of being involved in or the victim of criminal activity

Transferring data internationally

Should we transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law.

Privacy Notice: SCITT TRAINEES

Your rights

Requesting access to your personal data

Under data protection legislation, you have the right to request access to your personal information that we hold. To make a request for your personal information, contact your school / setting.

You also have the right to:

- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

We aim to respond to Subject Access Requests within one month but during school holidays this may become more difficult.

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please liaise with your school / setting contact.

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

Privacy Notice: SCITT TRAINEES

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**:

- FAO Jenny Lane - The DPO at dpo@saet.co.uk or telephone 01562 542574

Write to:
Data Protection Officer
Severn Academies Educational Trust
Wyre Forest House
Fine Point Way
Kidderminster
Worcestershire
DY11 7WF

This notice is based on the [Department for Education's model privacy notice](#), amended for trainees and to reflect the way we use data in this Trust.



Privacy Notice: Students

March 2023

Privacy Notice: Students

You have a legal right to be informed about how our Trust use any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This privacy notice explains how we collect, store and use personal data about **students**. Severn Academies Educational Trust (SAET), is the 'data controller' for the purposes of data protection law. **Our data protection officer is Jenny Lane** (see 'Contact us' below).

The categories of student information we process include:

We hold and process some personal information about you to make sure we can help you learn and look after you at school.

For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

This information includes:

- Personal identifiers and contacts (such as your name, unique student number, contact details, and address)
- Your test results
- Your attendance records
- Your characteristics (such as ethnicity, language, free school meal eligibility)
- Special educational needs (including the needs and ranking)
- Medical and administration (such as doctor's information, child health and wellbeing, dental health, allergies, medication and dietary requirements)
- Attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Assessment and attainment (such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
- Behavioural information (such as rewards, exclusions, and any relevant alternative provision put in place)
- Biometrics (used to access school meals and resources from the school library)
- Photographs and videos taken whilst engaged in school activities (used, for example, to evidence learning, for identification, on school displays, for school communications and publicity)
- CCTV images (to maintain safe and secure school sites)
- Safeguarding information to look after you and keep you safe (such as court orders and professional involvement)

Some of the information collected is called "special category personal data" (for example racial or ethnic origin, your religious beliefs, special educational needs and disability information, medical/health information, dietary requirements, biometric data etc.). We will take extra care to make sure that this is kept safe.

Why we collect and use student data

We collect and use student information, for the following purposes:

- a) to support student learning
- b) to monitor and report on student attainment progress
- c) to provide appropriate pastoral care
- d) to celebrate success
- e) to assess the quality of our services
- f) to keep children safe (food allergies, emergency contact details, health and wellbeing information)
- g) to meet the statutory duties placed upon us for the Department for Education (DfE) data collections

Privacy Notice: Students

Under the UK General Data Protection Regulation (UK GDPR), the main lawful basis we rely on for processing student information is:

Public Interest (Article 6, 1e UK GDPR) – where the use of your data is necessary to permit us to carry out a task in the public interest (SAET’s public interest is to provide an education)

We also rely on other lawful bases, which are:

Legal Obligation (Article 6, 1c UK GDPR) – where the use of your data is necessary to permit the school to comply with the law, such as our duty to safeguard students

Consent (Article 6, 1b UK GDPR) – if we rely on this basis, we will be clear so you know that you have the choice to consent (or not) for us to use your data

Vital Interests (Article 6, 1d UK GDPR) – where the use of your data is necessary to protect life, such as sharing personal data with emergency services

Where we have got permission to use your data, you or your parents/carers may remove this at any time. We will make this clear when we ask for permission, and explain how to go about removing consent.

Some of the reasons listed above for collecting and using your information overlap, and there may be several bases we rely on to use your data.

In addition, when processing special category personal data, we rely on Article 9 of UK GDPR:

Explicit Consent (Article 9, 2a UK GDPR) – where you have given us permission to process your data

Health or Social Care (Article 9, 2h, Schedule 1 part 1 paragraph 2 (2) UK GDPR) – where we need to use your data for health and social care, for example special dietary requirements, first aid or to support your wellbeing

Legal Claims or Judicial Acts (Article 9, 2f UK GDPR) – there may also be circumstances where we need to use your information in relation to legal matters

Substantial Public Interest (Article 9, 2g UK GDPR and, Part 2 of Schedule 1, 8 and 18 of the DPA 2018) – to provide you with equal opportunities and treatment (8) and to fulfil our safeguarding responsibilities

Vital Interests (Article 9, 2c UK GDPR) – to protect your life, such as sharing information with the emergency services

Collecting this information

We collect student information via registration forms at the start of the school year or Common Transfer File (CTF) or secure file transfer from previous school.

Student data is essential for our schools’ operational use. In most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data. To comply with Data protection law we will always tell you if it’s optional. If you must provide the data, we will explain what might happen if you don’t.

How we store this data

We will keep personal information about you while you are a student at our school. We may also keep it after you have left the Trust, where we are required to by law.

Privacy Notice: Students

We keep your data safe to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, changed or released.

We have a record retention schedule which sets out how long we must keep information about students. To request a copy of the retention schedule email: office@saet.co.uk,

Data sharing

We do not share personal information about you with anyone outside the Trust without permission from you or your parents/carers, unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- Our local authority – to meet our legal duties to share certain information with it, such as concerns about students' safety and exclusions
- The Department for Education and the Education and Skills Funding Agency, these are government departments and we share data as required by the law
- Schools / Multi-Academy Trusts e.g. transferring files if you move school
- Your family and representatives e.g. progress and achievement reporting
- Educators and examining bodies because we legally have to share information such as assessment data and must transfer student files if you move to another school
- Education software systems, this may include systems to help you practice timetables and spelling, to help with homework or revision in GCSE subjects or to show you reward points you have earned at school. These systems relate to our public task to provide you with an education. If you would prefer to do these activities without using the systems your school has put in place, please let your teacher know and we will arrange an alternative for you;
- Our regulator Ofsted, to assist with the inspection and assessment of the education we provide
- Suppliers and service providers – to enable them to provide an effective service to the school, such as careers advisers, school meal providers, cadets or external tutors
- Our auditors who inspect our financial records to test that we are maintaining the high standards expected
- Health authorities and social welfare organisations, sharing certain information to meet our legal obligations, providing the support required to ensure the safety and wellbeing of our students alongside the best education possible
- Professional advisers and consultants that provide expert advice to the Trust
- Charities and voluntary organisations – we share certain information to support the well-being and learning of our students as required
- Official authorities e.g. the Police, courts etc. – we have a legal obligation to share information related to criminal activity
- Youth support services (for those students age 13 plus)

Youth support services – students age 13 plus:

Once you reach the age of 13, we also pass student information to our local authority as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers

The information shared is limited to the student's name, address and date of birth. However, where a parent or guardian (or you once you reach the age of 16) provides their consent, other information relevant to the provision of youth support services will be shared.

Privacy Notice: Students

Students aged 16 plus:

We will also share certain information about students aged 16 plus with our local authority as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers

Student data is transferred via a secure portal to the local authority.

For more information about services for young people, please visit Worcestershire County Council website.

Department for Education (DfE)

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our students with the DfE either directly or via our local authority for the purpose of those data collections, such as the school census, under Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013

Some of this information is then stored in the [National Pupil Database](#), which is managed by the DfE and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

The DfE may share information from the database with other organisations which promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

You can find more information about this on the DfE's webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) if you have any questions about the database.

Transferring data internationally

Where we share data with an organisation that is based outside the UK, we will protect your data by following data protection law.

Requesting access to your personal data

Under data protection legislation, parents and students have the right to request access to information about them that we hold. To make a request for your personal information contact your school setting.

You also have the right to:

- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason
- for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of
- scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a
- legal or similarly significant effect on you

Privacy Notice: Students

We aim to respond to Subject Access Requests within one month but during school holidays this may become more difficult.

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please contact your school setting.

Complaints

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong.

You can make a complaint at any time by contacting our Data Protection Officer.

You can also complain to the Information Commissioner's Office in one of the following ways:

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**:

- FAO Jenny Lane - The DPO at dpo@saet.co.uk or telephone 01562 542574
Write to:
Data Protection Officer
Severn Academies Educational Trust
Wyre Forest House
Fine Point Way
Kidderminster
Worcestershire
DY11 7WF

This notice is based on the [Department for Education's model privacy notice](#) for students, amended to reflect the way we use data in this Trust.



Privacy Notice: Visitors

March 2023

Privacy Notice: Visitors

Under data protection law, individuals have a right to be informed about how the Trust 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 Trust, in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Severn Academies Educational Trust (SAET), is the 'data controller' for the purposes of data protection law. **Our data protection officer is Jenny Lane** (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:

- Name
- Contact details
- Information relating to your visit, e.g. your company or organisation name, arrival and departure time, car number plate
- Proof of identification for the duration of your visit
- CCTV images captured by the Trust
- Information about any access arrangements you may need
- Appropriate qualifications relevant to the purpose of your visit.

Why we use this data

We use this data to:

- Identify you and keep you safe while on site
- Keep pupils and staff safe
- Maintain accurate records of visits to the Trust
- Provide appropriate access arrangements

Use of your personal information for marketing purposes

Where you have given us consent to do so, SAET may send you marketing information by email or text promoting Trust 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.

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

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

- Legal obligation (Article 6, 1c UK GDPR) such as part of our safeguarding obligations, keeping children safe

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

- Public Interest (Article 6, 1e UK GDPR) – where we using the data is necessary to permit us to carry out a task in the public interest (SAET's public interest is to provide an education)
- Consent (Article 6, 1b UK GDPR) – if we rely on this basis, we will be clear that there is a choice to consent (or not) for us to use the data

Privacy Notice: Visitors

- Vital Interests (Article 6, 1d UK GDPR) – where the use of data is necessary to protect life, such as sharing personal data with emergency services
- Legitimate Interest (Article 6(1)(f) UK GDPR) - where we have legitimate interests in processing your data, we will carry out a 'balancing test' to make sure our processing does not infringe your interests, rights and freedoms. We will only use the data in ways that you would reasonably expect.

The legitimate interests we have are:

- Providing you with paper-based marketing communications based on what we think you'll be interested in

Where we have obtained consent, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how to withdraw it.

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

Some of the information we collect from you is mandatory, and in some cases you can choose whether or not to provide the information 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.

We will only collect the data that we need in order to fulfil our purposes, which are set out above.

How we store this data

We will keep your personal data while you are visiting our Trust.

We may also keep it beyond this, if necessary, to comply with our legal obligations.

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.

Once your visits with us have ended, we will retain this information and delete it in accordance with our record retention schedule.

To request a copy of the retention schedule email: office@saet.co.uk

Data sharing

We do not share information about visitors 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 visitors with:

- Our local authority – to meet our legal duties to share certain information with it, such as safeguarding concerns
- The Department for Education to meet our legal obligations to share certain information with it, such as demonstrating safeguarding practice, good security etc.

Privacy Notice: Visitors

- Our regulator Ofsted, to assist with the inspection and assessment of the quality of education provision which includes safeguarding
- Suppliers and service providers – to enable them to provide the service we have contracted them for e.g. provision of visitor management systems
- Professional bodies to fulfil their function of providing expert advice to schools, e.g. visit management, security, etc.
- Our auditors to meet our legal obligation in allowing access to our records to test the rigour and compliance of our risk management processes
- Professional advisers and consultants in fulfilling our official function to support school improvement
- Police forces, courts, tribunals to meet our legal obligations to share certain information, such as if a person has been suspected of being involved in or the victim of criminal activity
- The organisation/company you are representing

Your rights

Requesting access to your personal data

Under data protection legislation, you have the right to request access to your personal information that we hold. To make a request for your personal information, liaise with your school/setting.

You also have the right to:

- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

We aim to respond to Subject Access Requests within one month but during school holidays this may become more difficult.

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please liaise with your school / setting contact.

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.

Privacy Notice: Visitors

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**:

- FAO Jenny Lane - The DPO at dpo@saet.co.uk or telephone 01562 542574

Write to:

Data Protection Officer
Severn Academies Educational Trust
Wyre Forest House
Fine Point Way
Kidderminster
Worcestershire
DY11 7WF

This notice is based on the [Department for Education's model privacy notices](#), amended for visitors and to reflect the way we use data in this Trust.



Privacy Notice: Governors, Trustees & Volunteers

March 2023

Privacy Notice: Governors, Trustees & Volunteers

Under data protection law, individuals have a right to be informed about how the Trust 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 working with the Trust in a voluntary capacity, including governors and trustees.

Severn Academies Educational Trust (SAET), is the 'data controller' for the purposes of data protection law. **Our data protection officer is Jenny Lane** (see 'Contact us' below).

The personal data we hold

We process data relating to those volunteering for our Trust. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Personal identifiers, contacts and characteristics (such as name, date of birth, contact details and postcode)
- Governance details (such as role, start and end dates and governor ID)
- References
- Information about relevant skills and experience
- 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 collect and use this data

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

- Establish and maintain effective governance
- Meet statutory obligations for publishing and sharing trustees' details
- 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, SAET may send you marketing information by email or text promoting Trust 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.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing Governors, Trustees and Volunteers information are:

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

- Legal obligation (Article 6, 1c UK GDPR) e.g. safer recruitment, as part of our safeguarding obligations
- Public Interest (Article 6, 1e UK GDPR) – where the use of your data is necessary to permit us to carry out a task in the public interest (SAET's public interest is to provide an education)

Privacy Notice: Governors, Trustees & Volunteers

- Less commonly:
- Consent (Article 6, 1b UK GDPR) – where you have provided us with consent to use your data, you may withdraw this consent at any time, if we rely on this basis, we will be clear so you know that you have the choice to consent (or not) for us to use your data.
- Vital Interests (Article 6, 1d UK GDPR) – where the use of personal data is necessary to protect life, such as sharing personal data with emergency services
- Legitimate Interest (Article 6(1)(f) UK GDPR) - where we have legitimate interests in processing your data, such as sending out paper based marketing information, we will carry out a 'balancing test' to make sure our processing does not infringe your interests, rights and freedoms. We will only use the data in ways that you would reasonably expect.

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.

In addition, when processing special category personal data, we rely on Article 9 of UK GDPR:

- Substantial Public Interest (Article 9, 2g UK GDPR and, Part 2 of Schedule 1, 8 and 18 of the DPA 2018) – to provide you with equal opportunities and treatment (8) and to fulfil our safeguarding responsibilities
- Vital Interests (Article 9, 2c UK GDPR) – to protect your life, such as sharing information with the emergency services

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 is stored in accordance with our retention schedule.

We maintain a file to store personal information about all volunteers. The information contained in this file is kept secure and is only used for purposes directly relevant to your work with the Trust.

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.

When your relationship with the Trust has ended, we will retain and dispose of your personal information in accordance with our retention schedule.

To request a copy of the retention schedule email: office@saet.co.uk

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 governors/trustees
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as governor/trustee support

Privacy Notice: Governors, Trustees & Volunteers

- Professional advisers and consultants, supporting our legal obligation to establish and maintain effective governance
- Police forces, courts, tribunals to meet our legal obligations to share certain information, such as if a person has been suspected of being involved in or the victim of criminal activity

Transferring data internationally

Should we transfer personal data to a country or territory outside of the UK, we will do so in accordance with data protection law.

Your Rights

Requesting access to your personal data

Under data protection legislation, you have the right to request access to your personal information that we hold. To make a request for your personal information, liaise with your school / setting contact.

You also have the right to:

- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

You may also have a right for your personal information to be transmitted electronically to another organisation in certain circumstances.

We aim to respond to Subject Access Requests within one month but during school holidays this may become more difficult.

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please liaise with your school / setting contact.

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/concerns/>
- Call 0303 123 1113
- Or write to:

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

Privacy Notice: Governors, Trustees & Volunteers

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**:

- FAO Jenny Lane - The DPO at dpo@saet.co.uk or telephone 01562 542574

Write to:
Data Protection Officer
Severn Academies Educational Trust
Wyre Forest House
Fine Point Way
Kidderminster
Worcestershire
DY11 7WF



Privacy Notice: Job Applicants (Religious)

March 2023

Privacy Notice: Job Applicants – Religious Schools

Under data protection law, individuals have a right to be informed about how the Trust 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 Trust.

Severn Academies Educational Trust (SAET), is the 'data controller' for the purposes of data protection law. **Our data protection officer is Jenny Lane** (see 'Contact us' below).

Successful candidates should refer to our privacy notice for staff for information about how their personal data is collected, stored and used.

The personal data we hold

Schools with a religious character may choose, or be required, to consider the religious affiliation of candidates for certain roles when making appointments. As religious beliefs constitute a special category of personal data, the privacy notice should clearly indicate how the school uses this information.

We process data relating to those applying to work at our Trust. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Characteristics information (such as gender, age, ethnic group, religious beliefs)
- 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

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

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

- Legal obligation (Article 6, 1c UK GDPR) e.g. safer recruitment, as part of our safeguarding obligations
- Public Interest (Article 6, 1e UK GDPR) – where the use of your data is necessary to permit us to carry out a task in the public interest (SAET's public interest is to provide an education)

Privacy Notice: Job Applicants – Religious Schools

Less commonly:

- Consent (Article 6, 1b UK GDPR) – where you have provided us with consent to use your data, you may withdraw this consent at any time, if we rely on this basis, we will be clear so you know that you have the choice to consent (or not) for us to use your data.
- Vital Interests (Article 6, 1d UK GDPR) – where the use of personal data is necessary to protect life, such as sharing personal data with emergency services
- Legitimate Interest (Article 6(1)(f) UK GDPR) - where we have legitimate interests in processing your data, such as sending out paper based marketing information, we will carry out a 'balancing test' to make sure our processing does not infringe your interests, rights and freedoms. We will only use the data in ways that you would reasonably expect.

In addition, when processing special category personal data, we rely on Article 9 of UK GDPR:

- Substantial Public Interest (Article 9, 2g UK GDPR and, Part 2 of Schedule 1, 8 and 18 of the DPA 2018) – to provide you with equal opportunities and treatment (8) and to fulfil our safeguarding responsibilities
- Explicit Consent (Article 9, 2a UK GDPR) – where you have given us permission to process your data
- Employment, social security and social protection law (Article 9, 2b UK GDPR) – to fulfil our legal obligations relating to safer recruitment

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 Trust'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 record retention schedule. 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.

When it is no longer required, we will delete your information in accordance with our record retention schedule.

To request a copy of the retention schedule email: office@saet.co.uk

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:

Privacy Notice: Job Applicants – Religious Schools

- Trade unions and associations to facilitate their role in supporting the workforce
- Suppliers and service providers – to enable them to provide the service we have contracted them for e.g. HR services and recruitment support
- Employment and recruitment agencies used from time to time to support the recruitment process
- Professional advisers and consultants used from time to time to support the recruitment process
- Police forces, courts, tribunals to meet our legal obligations to share certain information, such as if a person has been suspected of being involved in or the victim of criminal activities
- Ofsted – to evidence the Trust’s recruitment process and equal opportunity, in accordance with School Staffing (England) Regulations 2009 and the Equality Act 2010.

Transferring data internationally

Should we transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law.

Your Rights

Requesting access to your personal data

Under data protection legislation, you have the right to request access to your personal information that we hold. To make a request for your personal information, liaise with your school / setting contact.

You also have the right to:

- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

You may also have a right for your personal information to be transmitted electronically to another organisation in certain circumstances.

We aim to respond to Subject Access Requests within one month but during school holidays this may become more difficult.

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please liaise with your school / setting contact.

Privacy Notice: Job Applicants – Religious Schools

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:

- FAO Jenny Lane - The DPO at dpo@saet.co.uk or telephone 01562 542574

Write to:

Data Protection Officer
Severn Academies Educational Trust
Wyre Forest House
Fine Point Way
Kidderminster
Worcestershire
DY11 7WF

This notice is based on the [Department for Education's model privacy notice](#), amended for job applicants to reflect the way we use data in this Trust.



**Privacy Notice:
Parents/Carers (use of their
personal data)**

March 2023

Privacy Notice: Parents/Carers – Use of their Personal data

Under data protection law, individuals have a right to be informed about how the Trust 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 **parents/carers**.

Severn Academies Educational Trust (SAET), is the 'data controller' for the purposes of data protection law. **Our data protection officer is Jenny Lane** (see 'Contact us' below).

The personal data we hold

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

- Name, contact details, contact preferences, family links, date of birth, identification documents
- Bank details
- Eligibility for free school meals
- Exclusion records
- Safeguarding information
- Photographs
- CCTV images captured by the Trust

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 collect and use this data

We use this data to:

- Support and celebrate student learning
- Report to you on student progress and attainment
- Keep you informed about the running of the Trust e.g. emergency closures, special events
- Process payments for Trust services and clubs
- To qualify if a child is eligible for funding and to calculate the funding available
- Provide appropriate pastoral care
- Protect student welfare
- Assess the quality of our services
- Administer admissions waiting lists
- 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, SAET may send you marketing information by email or text promoting Trust 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

Privacy Notice: Parents/Carers – Use of their Personal data

by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting our data protection officer.

Under the UK General Data Protection Regulation (UK GDPR), the main lawful basis we rely on for processing parents/carers information is:

- Public Interest (Article 6, 1e UK GDPR) – where we using the data is necessary to permit us to carry out a task in the public interest (SAET's public interest is to provide an education)
- Legal Obligation (Article 6, 1c UK GDPR) – where the use of data is necessary to permit the school to comply with the law, such as our duty to safeguard students
- Contract (Article 6 1b UK GDPR) – where we need to fulfil a contract we have entered into with you

We also rely on other lawful bases, which are:

- Consent (Article 6, 1b UK GDPR) – if we rely on this basis, we will be clear that there is a choice to consent (or not) for us to use the data
- Vital Interests (Article 6, 1d UK GDPR) – where the use of data is necessary to protect life, such as sharing personal data with emergency services
- Legitimate Interest (Article 6(1)(f) UK GDPR) - where we have legitimate interests in processing your data, we will carry out a 'balancing test' to make sure our processing does not infringe your interests, rights and freedoms. We will only use the data in ways that you would reasonably expect.

The legitimate interests we have are:

- Providing you with paper-based marketing communications based on what we think you'll be interested in

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

In addition, when processing special category personal data, we rely on Article 9 of UK GDPR:

- Substantial Public Interest (Article 9, 2g UK GDPR and, Part 2 of Schedule 1, 8 and 18 of the DPA 2018) – to provide equal opportunities and treatment to our students (8) and to fulfil our safeguarding responsibilities
- Explicit Consent (Article 9, 2a UK GDPR) – where permission has been given to process the data
- Vital Interests (Article 9, 2c UK GDPR) – to protect life, such as sharing information with the emergency services

Where we have obtained consent to use parent/carer personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Collecting this information

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

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

How we store this data

Privacy Notice: Parents/Carers – Use of their Personal data

We keep personal information about parent/carer while their children attend our Trusts. We create and maintain a student file for each child. The information is kept securely in electronic and hard copy formats and is only used for purposes directly relevant to your child's educational and welfare needs.

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 may also keep it beyond their attendance at our Trust if this is necessary in order to comply with our legal obligations. Our record retention schedule sets out how long we keep information about parent/carer. After the retention period has elapsed, all data will be destroyed securely.

To request a copy of the retention schedule email: office@saet.co.uk

Data sharing

We do not share information about parent/carer 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 parent/carer with:

- Our local authority – to meet our legal duties to share certain information with it, such as exclusion data or safeguarding matters
- The Department for Education to meet our legal reporting obligations e.g. pupil census
- Schools / Multi-Academy Trusts e.g. transferring files if a child moves school
- Our regulator Ofsted, to assist with the inspection and assessment of the quality of education provision
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Our auditors to meet our legal obligation in allowing access to our records to test the rigour and compliance of our financial management processes
- Health authorities to meet our legal obligations to share certain information with it, such as where the parent, carer or legal guardian or Trust has requested an Education Health Care Plan (EHCP) or where there are health concerns related to safeguarding or where emergency services are required
- Professional advisers and consultants such as where advice is sought from Behaviour Support Teams or the Educational Psychology Service in meeting our legal obligation and fulfil our official function
- Charities and voluntary organisations - sharing of certain information such as when using a counselling or mentoring service for a child so as to fulfil our official function.
- Police forces, courts, tribunals to meet our legal obligations to share certain information with it, such as if a child or young person has been suspected of being involved in or the victim of criminal activity

Transferring data internationally

Should we transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law.

Your rights – Requesting access to your personal data

Under data protection legislation, parents / carers have the right to request access to information about them that we hold. To make a request for your personal information, contact your school setting.

Privacy Notice: Parents/Carers – Use of their Personal data

You also have the right to:

- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

We aim to respond to Subject Access Requests within one month but during school holidays this may become more difficult.

Where we are processing your personal data with consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your child's personal data, please let us know by liaising with your school contact.

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**:

- FAO Jenny Lane - The DPO at dpo@saet.co.uk or telephone 01562 542574

Write to:

Data Protection Officer
Severn Academies Educational Trust
Wyre Forest House
Fine Point Way
Kidderminster
Worcestershire
DY11 7WF

This notice is based on the [Department for Education's model privacy notice](#) for parents/carers amended for parents and to reflect the way we use data in this Trust.



Privacy Notice: Staff

March 2023

Privacy Notice: Staff

Under data protection law, individuals have a right to be informed about how the Trust 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 in our Trust.

Severn Academies Educational Trust (SAET), is the 'data controller' for the purposes of data protection law. **Our data protection officer is Jenny Lane** (see 'Contact us' below).

The personal data we hold

We process data relating to those we employ, or otherwise engage, to work in our Trust.

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, disclosure and barring checks, 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, timetables, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Information about business and pecuniary interests
- Copy of driving license
- Photographs
- CCTV footage
- Data about your use of the Trust'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
- Biometrics (where used for ID purposes)
- 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 Trust, including to:

- Enable you to be paid
- Support staff well-being
- 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
- Declaration of interest to uphold the principle of public office - honesty
- Enable equalities monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

Privacy Notice: Staff

Use of your personal information for marketing purposes

Where you have given us consent to do so, SAET may send you marketing information by email or text promoting Trust 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.

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

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

- Contract (Article 6 1b UK GDPR) – where we need to fulfil a contract we have entered into with you
- Public Interest (Article 6, 1e UK GDPR) – where we using the data is necessary to permit us to carry out a task in the public interest (SAET's public interest is to provide an education)
- Legal Obligation (Article 6, 1c UK GDPR) – where the use of data is necessary to permit the school to comply with the law, such as our duty to safeguard students

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

- Consent (Article 6, 1b UK GDPR) – where you have provided us with consent to use your data, you may withdraw this consent at any time, if we rely on this basis, we will be clear so you know that you have the choice to consent (or not) for us to use your data.
- Vital Interests (Article 6, 1d UK GDPR) – where the use of personal data is necessary to protect life, such as sharing personal data with emergency services
- Legitimate Interest (Article 6(1)(f) UK GDPR) - where we have legitimate interests in processing your data, such as sending out paper based marketing information, we will carry out a 'balancing test' to make sure our processing does not infringe your interests, rights and freedoms. We will only use the data in ways that you would reasonably expect.

The legitimate interests we have are:

- Providing you with paper-based marketing communications based on what we think you'll be interested in

In addition, when processing special category personal data, we rely on Article 9 of UK GDPR:

- Substantial Public Interest (Article 9, 2g UK GDPR and, Part 2 of Schedule 1, 8 and 18 of the DPA 2018) – to provide you with equal opportunities and treatment (8) and to fulfil our safeguarding responsibilities
- Explicit Consent (Article 9, 2a UK GDPR) – where you have given us permission to process your data
- Employment, social security and social protection law (Article 9, 2b UK GDPR) – to fulfil our legal obligations relating to safer recruitment

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 Trust'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.

Privacy Notice: Staff

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 retention schedule. 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.

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.

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.

To request a copy of the retention schedule email: office@saet.co.uk

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 duties to share certain information with it, such as safeguarding concerns
- The Department for Education to meet our legal obligations to share certain information with it, such as workforce census collections
- Your family and representatives in an emergency situation
- Educators and examining bodies to meet our legal obligations to share information relating to the administration of examinations
- Our regulator Ofsted, to assist with the inspection and assessment of the quality of education provision
- Financial organisations to enable pension, tax and student loan deductions
- Central and local government to facilitate information to them about the school workforce census
- Health and Social welfare organisations to provide support to the workforce where occupational health might need to be arranged
- Trade unions and associations to facilitate their role in supporting the workforce
- Suppliers and service providers – to enable them to provide the service we have contracted them for e.g. payroll and HR services, cashless catering
- Employment and recruitment agencies to support the recruitment process
- Professional bodies e.g. pension regulators
- Our auditors to meet our legal obligation in allowing access to our records to test the rigour and compliance of our financial management processes
- Professional advisers and consultants in fulfilling our official function to support school improvement
- Police forces, courts, tribunals to meet our legal obligations to share certain information, such as if a person has been suspected of being involved in or the victim of criminal activity

Transferring data internationally

Should we transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law.

Privacy Notice: Staff

Your rights

Requesting access to your personal data

Under data protection legislation, you have the right to request access to your personal information that we hold. To make a request for your personal information, contact your school / setting.

You also have the right to:

- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

We aim to respond to Subject Access Requests within one month but during school holidays this may become more difficult.

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please liaise with your school / setting contact.

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

Privacy Notice: Staff

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**:

- FAO Jenny Lane - The DPO at dpo@saet.co.uk or telephone 01562 542574

Write to:

Data Protection Officer
Severn Academies Educational Trust
Wyre Forest House
Fine Point Way
Kidderminster
Worcestershire
DY11 7WF

This notice is based on the [Department for Education's model privacy notice](#), amended for staff and to reflect the way we use data in this Trust.



Privacy Notice: Suppliers of Goods and Services

March 2023

Privacy Notice: Suppliers of Goods and Services

Under data protection law, individuals have a right to be informed about how the Trust 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 suppliers of goods and services that the Trust contracts with, including their individual representatives, employees and agents ("you", "your"), in line with the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

Severn Academies Educational Trust (SAET), is the 'data controller' for the purposes of data protection law. **Our data protection officer is Jenny Lane** (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:

- Names, characteristics and contact details of representatives and other individuals employed by you or working on your behalf who we liaise with, and who are carrying out duties under your contract with us
- References, CVs and details of an individual's employment history, if collected as part of a bidding, tendering or engagement process
- Bank details and other financial information where it relates to an individual, such as if you're operating as a sole trader
- Any other personal information necessary to fulfil the terms of a contract we have with you

If our contract with you requires you or your representatives, employees or agents to visit or carry out any work at the Trust site, we may also collect, use and store:

- Information relating to the visit, e.g. the individual's company or organisation name, arrival and departure time, car number plate
- Photographs for identification purposes
- CCTV images captured by the Trust
- Information about any access arrangements that may be required

In this case, our privacy notice for visitors to the Trust will also apply, please see the school Website for details.

Why we use this data

We use this data to:

- Decide whether to engage you
- Fulfil the terms of our contract with you, e.g. payment, security checks, qualifications, etc.
- Keep accurate records of the suppliers that we use
- Identify you and your representatives, employees and agents while on the Trust site, and keep all individuals safe
- Keep pupils and staff safe while you or your representatives, employees or agents are on the Trust site
- Keep accurate records of visits to the Trust

Use of your personal information for marketing purposes

Where you have given us consent to do so, SAET may send you marketing information by email or text promoting Trust 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.

Privacy Notice: Suppliers of Goods and Services

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing suppliers of goods and services information are:

- Contract (Article 6 1b UK GDPR) – where we need to fulfil a contract we have entered into with you
- Legal Obligation (Article 6, 1c UK GDPR) – where the use of data is necessary to permit the school to comply with the law, such as our duty to safeguard students

We also rely on other lawful bases, which are:

- Public Interest (Article 6, 1e UK GDPR) – where we using the data is necessary to permit us to carry out a task in the public interest (SAET's public interest is to provide an education)
- Consent (Article 6, 1b UK GDPR) – if we rely on this basis, we will be clear that there is a choice to consent (or not) for us to use the data
- Vital Interests (Article 6, 1d UK GDPR) – where the use of data is necessary to protect life, such as sharing personal data with emergency services
- Legitimate Interest (Article 6(1)(f) UK GDPR) - where we have legitimate interests in processing your data, we will carry out a 'balancing test' to make sure our processing does not infringe your interests, rights and freedoms. We will only use the data in ways that you would reasonably expect.

The legitimate interests we have are:

- Providing you with paper-based marketing communications based on what we

In addition, when processing special category personal data, we rely on Article 9 of UK GDPR:

- Vital Interests (Article 6, 1d UK GDPR) – where the use of your data is necessary to protect life, such as sharing personal data with emergency services

Where we have obtained consent, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how to withdraw it.

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

Collecting this information

Some of the information we collect from you is mandatory, and in some cases it is optional.

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

We will only collect the data that we need in order to fulfil our purposes, which are set out above.

How we store this data

Personal data is stored in line with our retention schedule. We create and maintain a contract file for each supplier. The information is only used for purposes directly relevant to your services and 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.

Once your contract with us has ended, we will retain this file and delete the information in it in accordance with our record retention schedule.

Privacy Notice: Suppliers of Goods and Services

To request a copy of the retention schedule email: office@saet.co.uk

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

Data sharing

We do not share information about suppliers or their representatives, employees or agents 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 your personal information with:

- Our local authority – to meet our legal duties to share certain information with it, such as safeguarding concerns
- The Department for Education to meet our legal obligations to share certain information with it, such as to demonstrate value for money
- Educators and examining bodies to meet our legal obligations to share information relating to the administration of examinations
- Our regulator Ofsted, to assist with the inspection and assessment of the quality of education provision
- Financial organisations to enable tax payments as appropriate
- Other suppliers and service providers – to enable systems and contracts to work together as necessary
- Professional bodies e.g. pension regulators where an organisation may be involved in this process
- Our auditors to meet our legal obligation in allowing access to our records to test the rigour and compliance of our financial management processes e.g. procurement
- Professional advisers and consultants in fulfilling our official function to support school improvement
- Police forces, courts, tribunals to meet our legal obligations to share certain information, such as if a person has been suspected of being involved in or the victim of criminal activity

Transferring data internationally

Should we transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law.

Your rights

Requesting access to your personal data

Under data protection legislation, you have the right to request access to your personal information that we hold. To make a request for your personal information, liaise with your school / setting contact.

You also have the right to:

- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

Privacy Notice: Suppliers of Goods and Services

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

We aim to respond to Subject Access Requests within one month but during school holidays this may become more difficult.

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please liaise with your school / setting contact.

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**:

- FAO Jenny Lane - The DPO at dpo@saet.co.uk or telephone 01562 542574

Write to:

Data Protection Officer
Severn Academies Educational Trust
Wyre Forest House
Fine Point Way
Kidderminster
Worcestershire
DY11 7WF

Privacy Notice: Suppliers of Goods and Services

This notice is based on the [Department for Education's model privacy notices](#), amended for suppliers and to reflect the way we use data in this Trust.