



University of Chichester Academy Trust

Privacy Notice Policy

2026-2027

Review Cycle: Annually

Approved by: Finance & Audit Committee

Date: 22 September 2026



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1 Introduction

1.1 Our organisation

The University of Chichester (Multi) Academy Trust (the 'Trust') is a company limited by guarantee with charity exempt status. Registered in England and Wales, our **registration number is 08595545**.

Registered office:

University of Chichester,
Bishop Otter Campus,
College Lane,
Chichester,
West Sussex, PO19 6PE.

Reference to the Trust is reference to its academies and SCITT that form the Trust.

1.2 Privacy Notice

The Privacy Notice Policy covers how the Trust treats personal information that we collect and receive. Personal information is information about you or relating to our students and pupils, that is personally identifiable, and not otherwise publicly available.

Protection of information is taken seriously, and we will not sell or rent personal information.

2 Legislation & Guidance

2.1 Data Protection Legislation

- Data Protection Act 2028
- UK GDPR
- Data Use and Access Act (DUAA) 2025

Data Protection Principles

The UK GDPR sets out seven key principles which lie at the heart of the UK GDPR and inform everything that we do under our Data Protection Policy and processes.





- ❖ **Lawful, Fair & Transparency:** Personal data processed lawfully, fairly and transparent
- ❖ **Purpose Limitation:** Data collected for specified, explicit and legitimate purposes only
- ❖ **Data Minimisation:** Only the data necessary for the purposes of processing should be collected
- ❖ **Accuracy:** Personal data must be accurate and kept up to date
- ❖ **Storage Limitation:** Data should be kept in a form which permits identification of data subjects for no longer than necessary
- ❖ **Integrity & Security:** Personal data processed securely to protect against unauthorised or unlawful processing and against accidental loss, destruction, or damage
- ❖ **Accountability:** The data controller is responsible for and must be able to demonstrate compliance with the principles

Compliance with the spirit of these key principles provides a framework for good data protection practice.

2.2 Data Controller

The University of Chichester Multi Academy Trust is the 'Data Controller', who is responsible for complying with the UK GDPR regulations. The 'Data Controller' determines the purpose and means of the processing of personal data.

2.3 Data Processor

Data Processors act on behalf of the Data Controller, and process data in line with the controller's instructions, unless it is required to do so by law.

A list of third-party organisations who act as our Data Processor and their purpose are listed in [Appendix 5](#).

2.4 Other legislation and guidance that supports this policy

- Keeping Children Safe in Education 2026
- Equality Act
- The Education (Information About Individual Pupils) (England) Regulations 2013
- Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments

3 Personal Information

Lawful Consent

To collect, use and retain personal information we must have a legitimate and lawful reason to enable us to manage the organisational processes. Consent where an individual gives clear, informed, specific, and unambiguous agreement for their personal data to be processed for a defined purpose is a lawful basis under UK GDPR.

Our lawful basis for collecting or using personal information are:

- Consent
- Contract
- Legal Obligation
- Public Task



4 Applicants, Staff, Trustees, Governors and Volunteers

Irrespective of the role of a staff member, volunteer, including trustees and local governors, we are required to collect personal data for the purpose of:

- **Recruitment, administration and management**
- **Salaries and pensions**
- **Staff health and wellbeing**
- **School Workforce data**

The Privacy Notice outlining the personal data collected, stored and retained in line with the processed listed above are outlined in [Appendix 1](#).

5 Teacher Education and Development

This function includes our Trust's SCITT programme and requires the collection and processing of personal data to support the requirements of trainee teachers, Early Career Teachers (ECTs) and other programme participants.

We are required to collect personal data for the purpose of:

- Recruitment and admissions to our teacher training programme
- Delivery, assessment and quality assurance of teacher development programmes
- Monitoring trainee progress, attainment and professional conduct
- Providing pastoral, wellbeing and learning support
- Meeting statutory, regulatory and funding requirements

The Privacy Notice outlining the personal data collected, stored and retained in line with the processed listed above are outlined in [Appendix 2](#).

6 Student and Pupil Data

We collect and hold personal information relating to our students and pupils and may also receive information about them from their previous school, local authority and/or the Department for Education (DfE).

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

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

The Privacy Notice outlining the categories of personal data collected, how we store and retain this data, as well as when we share pupil data in line with the processes listed above are outlined in [Appendix 3](#).



7 Customers and Suppliers

We collect information from suppliers and customers to provide services and goods for purposes of our business operations as well as payments for services.

The Privacy Notice outlining the personal data collected, stored and retained in line with the processed listed above are outlined in [Appendix 4](#).

8 Website Data

The University of Chichester Academy Trust's website provider, Juniper, automatically receives and records information on its server logs from your browser, including your IP address, cookie information, and the page you request.

We use information to customise the content you see, fulfill your requests and for technical web site administration purposes.

9 Data Security

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, or destruction.

10 Data Retention

We retain your personal data for as long as necessary to fulfil the purposes outlined in this privacy notice and to comply with legal and regulatory requirements. Our Record Management Policy outlines the retention periods.

11 Your Data Protection Rights

Rights to Personal Data

Under data protection law, you have the following rights:

- **Your right to be informed** – You have the right to be informed about the collection and use of your personal data
- **Your right of access** - You have the right to ask us for copies of your personal data, this is called 'right of access', this is also known as a Subject Access Request (SAR), data subject access request or right of access request
- **Your right to rectification** - You have the right to ask us to change any information you think is inaccurate or incomplete
- **Your right to erasure** - You have the right to ask us to erase your personal data in certain circumstances
- **Your right to restriction of processing** - You have the right to ask us to stop using your information, in certain circumstances
- **Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances



- **Your right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent

You have rights in relation to automated decision making and profiling should this be used.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- Right to erasure does not apply when the lawful basis for processing is legal obligation or public task
- Right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you do not have the right to object, but you have the right to withdraw consent

Access to your Personal Data

The UK GDPR gives parents and pupils certain rights about how their information is collected and used. To make a request for your personal information, or be given access to your child's educational record, contact the relevant department listed below:

- Pupil or Parent record – admin office in your school
- Staff member, volunteer – People Team on people@chimat.uk
- ECT, student teacher – SCITT Team on hello@portsmouthscitt.chimat.uk
- Trustee or Governor – Company Secretary on governance@chimat.uk

For further information on the process, please refer to our **Subject Access Request (SAR) procedure**.

You do not usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you, although there are some exceptions to this and we will advise you on acknowledging a request.

Alternatively, a data protection rights request can be directed to:

University of Chichester (Multi) Academy Trust

Arran House
Upper Bognor Road
Bognor Regis
West Sussex, PO21 1HR

Tel: 01243 793502

Email: office@chimat.uk

Website: <https://www.chimat.uk/>

Raising a Complaint

Should you find yourself in a situation where you want to make a complaint about your personal information, please follow our **Complaint Policy**.

Once all Complaint Policy stages have been followed, and you feel your concern about how we handled your personal data, remains unresolved, you have the option to complain directly to the Information Commissioner's Office (ICO). The ICO contact details are:

**Information Commissioner's Office**

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint> - [raise a concern with ICO](#)

12 Policy Approval

This policy is a Trust wide policy and approved by the Finance and Audit Committee.

Whilst this policy is reviewed on an annual basis, the content of the policy may be reviewed and amended without prior notice. Our website will have the current policy published.

13 Links with other policies

- Data Protection Policy
- Subject Access Request Procedures
- Record Management (including data retention)
- Biometric Policy
- CCTV Policy
- Complaint Policy
- Safeguarding & Child Protection Policy

14 References

This policy is also based on the following legislation and guidance:

- Department for Education (DfE): Privacy Notices, An explanation of privacy notes (October 2025) [Privacy notices: an explanation](#)
- DfE: Data Protection: privacy notices model documents (October 2025) [Data protection: privacy notice model documents - GOV.UK](#)
- DfE: Data protection in schools (July 2026) [Data protection in schools - Data protection policies and procedures - Guidance - GOV.UK](#)
- Information Commissioner's Office (ICO) (July 2026) [Create your own privacy notice | ICO](#)

15 Appendices

Appendix 1: Applicants, Staff, Trustees and Governors Privacy Notice

Appendix 2 Teacher Development (including SCITT) Privacy Notice

Appendix 3: Student and Pupil Privacy Notice

Appendix 4: Customers and Suppliers Privacy Notice

Appendix 5: Data Processes: Third Party Companies (Data Sharing Agreements) 



Appendix 1: Applicants, Staff, Trustees, Governors & Volunteers Privacy Notice

We use workforce data to:

- a) enable the development of a comprehensive picture of the workforce and how it is deployed
- b) inform the development of recruitment and retention policies
- c) enable individuals to be paid

Recruitment, Administration and Management

Workforce data is essential for the Trust and its family of school's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with UK GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

The personal data we collect as an organisation includes:

- ✓ Contact details (e.g. name, address, telephone number or personal email address, emergency contact details)
- ✓ Date of birth
- ✓ National Insurance number
- ✓ Teacher number (where applicable)
- ✓ Gender
- ✓ Photographs (e.g. staff ID card)
- ✓ Copies of passports or other photo ID (e.g. driving licence)
- ✓ Copies of proof of address documents (e.g. bank statements or bills)
- ✓ Marital status
- ✓ Next of kin or emergency contact details
- ✓ Employment history (e.g. job application, employment references or secondary employment)
- ✓ Education history (e.g. qualifications)
- ✓ Right to work information
- ✓ Details of any criminal convictions (e.g. DBS checks)
- ✓ Political, conflict of interest or gift declarations
- ✓ Security clearance details (e.g. basic checks and higher security clearance)
- ✓ Performance records (e.g. reviews, disciplinary records, complaints or disciplinary action)
- ✓ Training history and development needs
- ✓ Monitoring employees' IT use
- ✓ CCTV images

We also collect the following information for staff recruitment, administration and management:

- Protected characteristics
- Health information
- Sexual orientation information

Our lawful basis for collecting or using personal information as part of **staff recruitment, administration and management** are:

- Consent
- Contract
- Legal obligation
- Public task



Salaries and Pensions

We collect or use the following personal information as part of **managing salaries and pensions**:

- ✓ Job role and employment contract (e.g. start and leave dates, salary, changes to employment contract or working patterns)
- ✓ Expense, overtime or other payments claimed
- ✓ Leave (e.g. sick leave, holidays or special leave)
- ✓ Maternity, paternity, shared parental and adoption leave and pay
- ✓ Pension details (including beneficiary details)
- ✓ Bank account details
- ✓ Payroll records
- ✓ Tax status
- ✓ Trade Union membership

We also collect the following information for managing salaries and pensions:

- Protected characteristics
- Health information
- Sexual orientation information

Our lawful basis for collecting or using personal information as part of **managing salaries and pensions** are:

- Consent
- Contract
- Legal obligation
- Public task

Staff Health and Wellbeing

We collect or use the following personal information for **managing staff health and wellbeing**:

- ✓ General health and wellbeing information
- ✓ Occupational health referrals and reports
- ✓ Sick leave forms or fit notes (e.g. Statement of Fitness for Work from a GP or hospital)
- ✓ Accident at work records
- ✓ Access needs or reasonable adjustments

We also collect the following information for **managing staff health and wellbeing**:

- Health information

Our lawful basis for collecting or using personal information as part of **managing staff health and wellbeing** are:

- Consent
- Contract
- Legal obligation
- Vital interests



Where we get Personal Information from

We collect your information from the following places:

- From staff members or volunteers directly
- Employment agency
- Referees (external or internal)
- Security clearance providers
- Occupational Health and other health providers
- Pension administrators or government departments (e.g. HMRC and DWP)
- Staff benefit providers
- CCTV images (from your landlord's or your own CCTV systems)

Who we share information with

In some circumstances, we may share information with the following organisations:

- HMRC
- Employee benefit schemes
- External auditors
- DfE
- Organisations with a legal right (e.g. Courts, Local Authorities)
- Occupational Health and other health providers

Data Processors

Third party companies acting as data processors for our Trust

A full list of third-party companies where we hold Data Sharing Agreements for a lawful basis to process and manage our personal data are listed in [Appendix 5](#).

Storing School Workforce Data

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

Sharing Workforce Information

We routinely share this information with:

- Our Local Authority (where applicable)
- The Department for Education (DfE)

We do not share information about our workforce members with anyone without consent unless the law and our policies allow us to do so.

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 school employees with the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.



For privacy information on the data the Department for Education (DfE) collects and uses, please see: <https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers> .

How Government uses your Data

The workforce data that we lawfully share with the Department for Education (DfE) through data collections:

- Informs the Department for Education (DfE) policy on pay and the monitoring of the effectiveness and diversity of the school workforce
- Links to school funding and expenditure
- Supports 'longer term' research and monitoring of educational policy

Data Collection Requirements

To find out more about the data collection requirements placed on us by the Department for Education (DfE) including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools> .

Sharing by the Department for Education (DfE)

The Department for Education (DfE) may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- Conducting research or analysis
- Producing statistics
- Providing information, advice or guidance

The Department for Education (DfE) will only share your personal data where it is lawful, secure and ethical to do so and has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether the Department for Education (DfE) releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of public benefit, proportionality, legal underpinning and strict information security standards.

For more information about the Department for Education's (DfE) data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the Department for Education (DfE) has provided information, (and for which project) please visit the following website: <https://www.gov.uk/government/publications/dfe-external-data-shares>

Access to your Personal Data at Department for Education (DfE)

Under the terms of the UK GDPR, you are entitled to ask the DfE:

- If they are processing your personal data
- For a description of the data they hold about you
- The reasons they are holding it and any recipient it may be disclosed to
- For a copy of your personal data and any details of its source



If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'Subject Access Request'. See the guide for details:

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

Further information on what personal information the Department for Education (DfE) holds about you is published in the privacy notices for education providers' workforce, including teachers. This is available below:

<https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>



Appendix 2: Teacher Development (including SCITT) Privacy Notice

Our SCITT provision and teacher development programmes, collects and processes personal information relating to applicants, trainee teachers, Early Career Teachers (ECTs), mentors and programme participants. This information is required to recruit, administer, deliver, assess and quality assure teacher training and professional development programmes.

Whilst the majority of information you provide is mandatory, some information may be provided voluntarily. We will inform you when information is optional and explain how it will be used.

We Use Teacher Development Data To:

- Process applications and admissions to teacher training programmes
- Undertake suitability and compliance checks
- Deliver training, mentoring and support
- Assess trainee progress and professional standards
- Award qualifications and recommend Qualified Teacher Status (QTS), where applicable
- Meet Department for Education (DfE), Teaching Regulation Agency (TRA), Ofsted, accredited provider and funding requirements
- Monitor programme quality and effectiveness
- Safeguard trainees, pupils and staff
- Provide welfare and wellbeing support
- Communicate with trainees, mentors and employing schools

Categories of Information We Collect

The personal data we collect may include:

Personal Information

- Name, title and previous names
- Home address
- Personal telephone numbers
- Email addresses
- Date of birth
- National Insurance number
- Teacher Reference Number (TRN), where applicable
- Photographic identification
- Emergency contact details



Application and Recruitment Information

- Application forms
- Employment history
- Qualifications and academic transcripts
- References
- Personal statements
- Interview records
- Right to work documentation
- DBS and safeguarding checks

Programme Information

- Placement details
- Mentor assessments
- Observation records
- Attendance records
- Progress reviews
- Training records
- Professional conduct records
- Assessment outcomes
- Qualification and certification information

Special Category Data

Where necessary, we may collect:

- Equality and diversity information
- Health information
- Disability information
- Information relating to reasonable adjustments
- Safeguarding information where required

Lawful Basis

Our lawful basis for collecting or using personal information as part of teacher development activities are:

- Consent
- Contract
- Legal Obligation
- Public Task
- Vital Interests (where necessary to protect individuals)



Where We Obtain Information From

We may obtain information from:

- Applicants and trainees directly
- Employing schools
- Placement schools
- Referees
- Universities and accredited providers
- Department for Education (DfE)
- Teaching Regulation Agency (TRA)
- Disclosure and Barring Service (DBS)
- Examination and awarding bodies

Storing Teacher Development Data

We hold teacher development data securely for the period specified within our Records Management Policy and associated retention schedules. Personal information is protected through appropriate technical and organisational security measures.

Sharing Information

We do not share personal information unless there is a lawful basis to do so.

Information may be shared with:

- Department for Education (DfE)
- Teaching Regulation Agency (TRA)
- Accredited Initial Teacher Training providers
- Partnership schools and employing schools
- Ofsted
- Examination and awarding organisations
- Universities
- Local Authorities where required
- Organisations with a legal right to receive information

Data Processors

Third party companies acting as data processors for our Trust

A full list of third-party companies where we hold Data Sharing Agreements for a lawful basis to process and manage our personal data are listed in [Appendix 5](#).



Appendix 3: Student and Pupil Privacy Notice

Collecting Pupil Data

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested is on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

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

- g. to support pupil learning
- h. to monitor and report on pupil attainment progress
- i. to provide appropriate pastoral care
- j. to assess the quality of our services
- k. to keep children safe (food allergies, or emergency contact details)
- l. to meet the statutory duties placed upon us for the Department for Education (DfE) data collections

Categories of Pupil Information

The categories of pupil information that we process include:

- ✓ Personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- ✓ Characteristics (such as ethnicity, language, and Free School Meal eligibility)
- ✓ Safeguarding information (such as court orders and professional involvement)
- ✓ Special Educational Needs (including the needs and ranking)
- ✓ Medical and administration (such as doctor's information, child health, 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 phonics results, post 16 courses enrolled for and any relevant results)
- ✓ Behavioural information (such as exclusions and any relevant alternative provision put in place)
- ✓ Trips and activities
- ✓ Catering and Free School Meal management

This personal information is provided by parents/carers, the list is not exhaustive and where there is any pupil information outside of this list, consent will be requested.

In addition, we may have a lawful basis to process any **Special Category data**:

- Biometric data, obtained through specific communication and consent
- Health conditions in line with those set out in the Equality Act where it impacts on the care and education needs of the individual

Our lawful basis for collecting or using personal information as part of **student and pupil data** are:

- Consent
- Legal obligation
- Public task
- Vital interests



Storing Pupil Data

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

Sharing Pupil Information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so. Any data shared is sent via secure portals.

In some circumstances, we may share information with the following organisations:

- The school/s the pupil attends after leaving
- Department for Education (DfE)
- Local Authorities including the LADO
- Inter-agencies (e.g. CSC, DWP, etc.)
- Ofsted
- Organisations with a legal right (e.g. courts)

Pupils Aged 13+

Once our pupils reach the age of 13, we also pass pupil information to our Local Authority and / or provider of youth support services 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 child's name, address and date of birth. However, where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16.

Pupils Aged 16+

We will also share certain information about pupils aged 16+ with our Local Authority and / or provider of youth support services 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

A parent/guardian can request that only their child's name, address and date of birth be passed to the relevant Local Authority by informing the Headteacher at the academy. This right is transferred to the child once he/she reaches the age 16. For more information about services for young people, please contact the relevant Local Authority.

We will not give information about our students and pupils to anyone without consent unless the law and our policies allow us to do so.



Data Processors

Third party companies acting as data processors for our Trust

A full list of third-party companies where we hold Data Sharing Agreements for a lawful basis to process and manage our personal data are listed in [Appendix 5](#).

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 pupils with the Department for Education (DfE) either directly or via our Local Authority for the purpose of those data collections under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

All data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls, which meet the current government security policy framework.

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

For privacy information on the data the Department for Education collects and uses, please see:

<https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3> and <https://www.gov.uk/government/publications/privacy-information-key-stage-4-and-5-and-adult-education>

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

How Government uses your Data

The pupil data that we lawfully share with the Department for Education (DfE) through data collections:

- Underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school
- Informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures)
- Supports 'longer term' research and monitoring of educational policy (for example, how certain subject choices go on to affect education or earnings beyond school)

The National Pupil Database (NPD)

The **National Pupil Database (NPD)** is owned and managed by the Department for Education (DfE) and contains information about pupils in schools in England. This information is securely collected from a range of sources including schools, Local Authorities and awarding bodies.

The data in the NPD is provided as part of the operation of the education system and is used for research and statistical purposes to improve, and promote, the education and well-being of children in England.

The evidence and data provide DfE, education providers, Parliament and the wider public with a clear picture of how the education and children's services sectors are working in order to better target, and evaluate, policy interventions to help ensure all children are kept safe from harm and receive the best possible education. To find out more about the NPD, go to:

<https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-notice>



How Government uses your Data

The DfE will only share pupils' personal data where it is lawful, secure and ethical to do so. Where these conditions are met, the law allows the Department for Education (DfE) to share pupils' personal data with certain third parties, including:

- Schools and Local Authorities
- Researchers
- Organisations connected with promoting the education or wellbeing of children in England
- Other government departments and agencies
- Organisations fighting or identifying crime

For more information about the Department for Education's (DfE) NPD data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Organisations fighting or identifying crime may use their legal powers to contact the Department for Education (DfE) to request access to individual level information relevant to detecting that crime. For information about which organisations the Department for Education (DfE) has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website: <https://www.gov.uk/government/publications/dfe-external-data-shares>

Access to your Personal Data at Department for Education (DfE)

Under the terms of the UK GDPR, you are entitled to ask the DfE:

- If they are processing your personal data
- For a description of the data they hold about you
- The reasons they are holding it and any recipient it may be disclosed to
- For a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'Subject Access Request'. See the guide for details:

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

Further information on what personal information the Department for Education (DfE) holds about you, published in the privacy notices for Early Years Foundation Stage to Key Stage 3, and Key Stage 4 and 5 and adult education, these are available below: <https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3>

<https://www.gov.uk/government/publications/privacy-information-key-stage-4-and-5-and-adult-education>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>



Appendix 4: Customers and Suppliers Privacy Notice

We collect or use the following information from suppliers and customers to provide services and goods for purposes of our business operations:

- ✓ Names and contact details, including 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
- ✓ Addresses
- ✓ Payment details (including card or bank information for transfers and Direct Debits)
- ✓ Account information
- ✓ References, CVs and details of an individual's employment history, if collected as part of a bidding, tendering or engagement process
- ✓ Any other personal information necessary to fulfil the terms of a contract we have with you
- ✓ Information required for DBS (Data Barring Service)

We collect or use the following information for **the operation of supplier or customer accounts**:

- Names and contact details
- Addresses
- Payment details (including card or bank information for transfers and Direct Debits)
- Purchase and Sales history

We collect or use the following information to **comply with legal requirements**:

- Name
- Contact information
- Financial transaction information
- DBS information

We use this data to:

- Decide whether to engage you
- Fulfil the terms of our contract with you, including payment
- Keep accurate records of the suppliers that we use
- Identify you while on an academy/the trust site and keep all individual safe

We collect your data in the following ways:

- Directly from you when you provide it to us
- From third-party sources (e.g. business partners, public sources)
- Through our website and other digital platforms

Lawful Basis

Our lawful basis for collecting or using personal information to **provide services and goods** are:

- Consent
- Contract
- Legal obligation
- Public task



Who we may share your personal data with:

- Our employees and affiliates
- Third-party service providers who assist us in our operations
- Legal and regulatory authorities, as required by law
- Business partners, as necessary for our business operations.

Data Processors

Third party companies acting as data processors for our Trust

A full list of third-party companies where we hold Data Sharing Agreements for a lawful basis to process and manage our personal data are listed in [Appendix 5](#).



Appendix 5: Data Processors: Third Party Data Sharing Agreements

NB: This list is subject to change and will be updated on a regular basis.

Third Party Supplier	Privacy Notice	Processing Purpose
Accelerated Reader	Student and Pupil	Pupil attainment
Access Payroll Bureau Service	Staff	Processing payroll information
Arbor	Staff Student and Pupil Customer and Supplier	Data relating to employee's personal information Contact information, family links, medical, pastoral, SEND, payments, attendance and attainment Managing pupil data for census, grant funding, and collecting payments from parents for school meals and educational activities
Corazon	SCITT Trainee	Processing of medical related data for Fitness to Teach questionnaires
CPOMS	Student and Pupil	Safeguarding records
GovernorHub	Trustees and Governors	Processing the membership of the Trust Board and Local Governing Bodies for communication and records for compliance
Hampshire Health	Staff	Processing of medical related data for pre-employment questionnaires
Insight	Pupil (primary only)	Tracking of academic outcome data, storage of SEND information, context data pulled in from Arbor (MIS)
Iris Financials	Customer and Supplier	Managing supplier and customer accounts, and related financial transactions
LGPS	Staff	Processing data related to pension scheme for professional services employees
Local Authority	Staff, Trustees, Governors, Volunteers Student and Pupil Customer and Supplier	Processing data related to safeguarding matters, namely LADO
MyNewTerm	Staff	Processing recruitment documentation and applicants for vacancies
OH Assessment	Staff	Processing of personal related data in relation to Occupational Health assessments
Pluxee	Staff	Employee benefits and assistance platform
School Hire	Customer and Supplier	Managing school lettings



Third Party Supplier	Privacy Notice	Processing Purpose
See Saw	Student and Pupil	Evidence of achievements, attainment and progress
SISRA	Student and Pupil	Pupil attainment, progress and contextual information
Specsavers	Staff and Volunteers	Processing data related to applications and provision of eyecare vouchers
Smoothwall	Student and pupil	Monitoring system linked to safety online
Study Bugs	Student and Pupil	Attendance Records
Tapestry	Student and Pupil	Evidence of achievements, attainment and progress
TPS	Staff	Processing data related to pension scheme for teaching employees
Tucasi	Student and Pupil Customers and Suppliers	Collecting payments from parents for school meals and educational activities, along with managing lettings
U-Check	Staff, Trustees, Governors, Volunteers, SCITT Trainees	Processing DBS applications