

UK GDPR PRIVACY NOTICE FOR PARENTS/CARERS

THIS NOTICE APPLIES TO ALL PARENTS/CARERS OF PUPILS ENROLLED AT HEARTWOOD LEARNING TRUST (HLT) AND ITS SCHOOLS/ACADEMIES

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Policy Updates

| Date | Page | Policy Updates |
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| June 2025 | Whole document | Re-formatting and re-write to ensure the privacy notice is compliant with data protection legislation and reflective of the Trust's vision and values |
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Introduction

Heartwood Learning Trust is an inclusive and collaborative Church of England multi-academy trust serving church, community and alternative provision schools. This policy is guided by our Christian ethos and the visions of our Trust and its schools/academies. We share a clear vision – to create schools where children and young people thrive, as we help them prepare to live life in all its fullness (John 10:10).

For us, a place to thrive means much more than a place simply to be comfortable. Instead, our aim is to develop schools and an educational offer which enable each pupil to flourish academically, practically, emotionally, socially and spiritually.

Privacy Notice

Heartwood Learning Trust are the data controllers for parents' and carers' personal data as defined by the UK GDPR. This means that the Trust will determine the purposes for which your personal data is processed and the manner of the processing. We will only collect and use your personal data in ways that are compliant with applicable data protection legislation. At each of our schools/academies there is a nominated GDPR representative who has responsibility for overseeing the day-to-day security of your personal data.

The Trust has a duty to ensure that Data Subjects (parents and carers) are informed about how we process the personal data that is in our control.

Where necessary, third parties may be responsible for processing parents' and carers' personal information. Where this is required, the Trust places data protection requirements on third party processors to ensure data is processed in line with your privacy rights and freedoms under UK General Data Protection Regulations (UK GDPR).

This notice is to help you understand how and why we collect personal information about you and what we do with that information. It also explains the decisions that you can make about your own information.

1. What categories of personal data do we process?

The categories of personal data that we process include the following:

- Personal identifiers (e.g. name, telephone number, email address, home address)*
- Payment Information
- Eligibility for Free School Meals
- Records of communications and interactions we have with you
- Parental consent forms (e.g. for photography and videos, educational visits and trips)

Please note this list is not exhaustive.

*It is the responsibility of the parent/carer to inform the school/academy/Trust immediately of any changes in personal information to ensure the contact details on file are updated.

2. Why do we process your personal data?

In order for the Trust to fulfil its official functions and meet legal requirements, we need to process some of your personal data. We process personal data in order to meet the safeguarding requirements set out in UK employment and childcare law.

We collect and use your personal data for the following purposes:

- To meet the statutory duties placed upon the Trust
- To enable the Trust/school/academy to communicate with you about your child
- To monitor and report on pupil attainment
- To receive payments and issue refunds, where appropriate
- To support pupil learning
- To provide appropriate pastoral care.
- To provide wraparound care before and after school, where applicable.

3. What is our lawful basis for processing your personal data?

Under the **UK General Data Protection Regulation (UK GDPR)**, the we would typically rely on the following lawful bases for processing personal information for general purposes:

- Article 6(1)(c) legal obligation (for the purpose of meeting the statutory duties placed upon the Trust/school/academy)
- Article 6(1)(e) public task
- Article 6(1)(a) consent

4. How do we collect your personal information?

We normally receive information directly from you, however we also collect data via third parties, as appropriate.

Whilst the majority of information you provide to us is mandatory and provided on admission, some of it is requested on a voluntary basis. To comply with the 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 to 'opt in' or to 'opt out'.

Data we collect from you directly:

- Admission Forms
- Consent Forms
- Records of communications

We also collect data from third parties:

- Local Authority
- Other agencies (e.g. Police, Health Services)

5. How do we store your information?

The majority of personal data is stored via the Trust's Google Drive (securely hosted in UK data centres). Physical documentation may be stored in locked filing cabinets with restricted access.

6. How long do we keep your personal data for?

We will only keep your personal data for as long as is required for us to meet our statutory obligations. Any personal data which we are not required by law to retain will only be kept for as long as is reasonably necessary to fulfil the purpose for which it was collected.

Your personal data is retained in line with the Trust's <u>Data Protection (UK GDPR) Policy</u> and the accompanying Data Retention Schedule, which is reviewed in line with applicable data protection legislation.

7. Who do we share your information with, and why?

We do not share information about parents/carers with any third party without consent unless the law requires us to do so. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about parents/carers with:

- Future education providers that your child enrolls at after leaving the school/academy
- Local Authority (applicable to the school/academy and parent/carer home address) to meet our legal obligations to share safeguarding and attendance information
- Ofsted to facilitate the regulation of the school/academy
- Department for Education (DfE) to meet our reporting obligations
- Survey Suppliers to improve teaching and learning based on parental feedback, where possible
- Health and social welfare organisations as required to meet the obligations placed on the Trust
- Police forces, courts, tribunals as required by law (e.g. for the purpose of crime prevention or detection)

8. What are your rights regarding your personal data?

Under the UK GDPR, you have the following rights in relation to the processing of your personal data:

- To be informed about how we process your personal data (e.g. by providing you with a copy of this
 privacy notice)
- To request access to or a copy of the personal data we hold about you*
- To data portability (the right to obtain and reuse your personal data for your own purposes)
- To request that your personal data is rectified (amended) if inaccurate or incomplete
- To request that your personal data is **erased** where there is no compelling reason for its continued processing
- To request that the processing of your personal data is **restricted** (e.g. consenting to it being stored but restricting it being processed any further)
- To object to your personal data being processed (e.g. where this is being used for marketing or research purposes)
- To object to automated processing or decision making regarding your personal data

*To submit a request for access to copies of the personal data we hold about you, please email dpo@hlt.academy. Requests will be processed in accordance with our Subject Access Request Policy.

How to withdraw consent

Where the Trust or school/academy processes data on the basis of consent, you have the right to withdraw your consent at any time. To withdraw your consent, you can contact the **Data Protection Officer (DPO)** via the below contact details to express your right to withdraw. You are not required to provide a reason for withdrawing consent.

9. How can you find out more information?

The Trust has appointed the **Chief Operating Officer** as its **Data Protection Officer**. The role of the **DPO** is to monitor our compliance with the UK GDPR and Data Protection Act 2018 and advise on data protection issues.

If you would like to discuss anything in this privacy notice or our use of your data, please contact the Trust's **DPO** via email: dpo@hlt.academy or telephone: 01904 560053. Alternatively you can write to us at: FAO Data Protection Officer (DPO), Heartwood Learning Trust, Rawcliffe Drive, York, YO30 6ZS.

If you require further information about how the DfE processes your personal data, please contact the DfE directly via their <u>website</u>.

10. How can you raise a concern?

If you are concerned about the way we are collecting or using your personal data, please raise your concern(s) with the Trust's **DPO** in the first instance.

If you would like to lodge a formal complaint, please follow the Trust's <u>Complaints Policy and Procedure</u> available on our website.

If you are unhappy about the way your concerns have been dealt with, or do not believe the Trust is adhering to data protection principles regarding your personal data, you can seek advice from the **Information Commissioner's Office (ICO)** via: https://ico.org.uk/concerns/.

11. Monitoring and Review

The Trust reserves the right to amend this privacy notice at any time. We will notify you of meaningful changes to the way we process your personal data (anything that will affect you). However, we would recommend that you revisit this privacy notice periodically to ensure you maintain a copy of the latest version.

Parents/carers will be made aware of this Privacy Notice at the point of admission. This privacy notice is also available on our website for anyone to view as required (https://hlt.academy/key-information/policies).

The Trust's **Deputy DPO** will periodically review this privacy notice to ensure it is accurate and remains compliant with current legislation and legal requirements placed upon the Trust. The Trust's **Deputy DPO** will update this privacy notice if we change how we collect and process your data.

This privacy notice will be reviewed every two years and approved by the **Chief Operating Officer.** The next scheduled review of this privacy notice can be found on the cover page of this document.