

Privacy notice for customers and hirers (how we use your personal information)

Under UK 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 customers and hirers/visitors to our central Trust and academies.

Our trust, The Challenge Academy Trust, is the 'data controller' for the purposes of UK data protection law.

Our data protection officer can be contacted as shown in the 'Contact us' section below.

The categories of information that we process

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

- Personal & business contact details such as name, title, addresses, telephone numbers, personal email & business email;
- Bank account details
- National Insurance Number & Unique Tax Reference and or Company Registration Relative Business information
- Security information including CCTV images, security incident reports (when applicable)

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

- Information about any access arrangements that may be required
- Photographs for identification purposes
- CCTV images captured in school

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 information

We use the data listed above to:

- To respond to your enquiries, to receive and administer your application and any memberships (if applicable), and to deal with any ongoing concerns or enquiries you have.
- To process payment of any fees and for the administration of session/ membership renewals including notification of upcoming membership expiry (if applicable).
- To provide you with access to our events, facilities, services and activities.

- To provide you with operational information about the events, facilities, services and activities such as cancellation of sessions, closures or other relevant communications.
- For monitoring compliance with and enforcement of relevant policies in relation to health and safety and security (prevention and detection of crime) - including the use of CCTV, and safeguarding.
- To monitor and evaluate our performance and effectiveness
- To maintain and improve our facilities and the services available;
- To seek advice on our rights and obligations, such as where we require our own legal advice
- To process the recovery of any money you owe to us
- To comply with any applicable laws and regulations

Use of your personal data for marketing purposes

. Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

The legal basis on which we use this information

We collect and use information under Article 6 (1)(b) and (1)(c) of the UK data protection law:

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| 6(1)(b) | Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract |
| 6(1)(c) | Processing is necessary for compliance with a legal obligation |
| 6(1)(d) | Processing is necessary to protect the vital interests of a data subject or another person |
| 6(1)(e) | Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller |

We collect and use sensitive pupil information under Article 9 (2) (b) of the UK data protection law:

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|---------|---|
| 9(2)(b) | Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law |
| 9(2)(c) | Processing is necessary to protect the vital interest of a data subject or another individual |
| 9(2)(e) | Processing relates to personal data manifestly made public by the data subject |
| 9(2)(f) | processing is necessary for establishment, exercise or defence of legal claims |

We may also process data in situations where:

- We have obtained consent to use it in a certain way

Where we have obtained consent to use your 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 grounds which justify our use of this data.

Collecting this data

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

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

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

Storing this information

We keep personal information about you while you are visiting our school. We may also keep it beyond your visit with our school if this is necessary. Our record retention schedule / sets out how long we keep information about visitors.

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

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

Why we share workforce information

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 UK data protection law) we may share personal information about you with:

- Our local authority, [name of local authority] – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies
- Our regulator, [specify as appropriate, e.g. Ofsted, Independent Schools Inspectorate]
- Suppliers and service providers:
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts or tribunals

Transferring data internationally

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

Requesting access to your personal data

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, contact the academy enquiries email as listed on individual websites or Dawn Golden, Compliance and Information Manager, on admin@tcat.uk.com

You also have the right to:

- to ask us for access to information about you that we hold
- 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

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Withdrawal of consent and the right to lodge a complaint

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 let us know by contacting Dawn Golden, Compliance and Information Manager, on admin@tcat.uk.com

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

Last updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on 12 October 2023

Contact us

If you would like to discuss anything in this privacy notice, please contact:

Dawn Golden Compliance and Information Manager on enquiries@tcat.uk.com at The Challenge Academy Trust, c/o Bridgewater High School, Broomfields Rd, Appleton,

Warrington, WA4 3AE.