Data Protection POLICY
Including Privacy Notices
Longford Park School

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Reviewed: 
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Signed: 
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1. Aims
Our school aims to ensure that all personal data collected about staff, pupils, parents, governors, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the expected provisions of the Data Protection Act 2018 (DPA 2018) as set out in the Data Protection Bill. This policy applies to all personal data, regardless of whether it is in paper or electronic format. A definition of what is considered personal data is given in Appendix 1.

2. Legislation and guidance
This policy meets the requirements of the GDPR and the expected provisions of the DPA 2018. It is based on guidance published by the Information Commissioner’s Office (ICO) on the GDPR and the ICO’s code of practice for subject access requests. It also reflects the ICO’s code of practice for the use of surveillance cameras and personal information. In addition, this policy complies with regulation 5 of the Education (Pupil Information) (England) Regulations 2005, which gives parents the right of access to their child's educational record.

3. Definitions

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<th>Term</th>
<th>Definition</th>
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<td>Personal data</td>
<td>Any information relating to an identified, or identifiable, individual. This may include the individual’s:</td>
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<td>● Name (including initials)</td>
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<td>● Identification number</td>
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<td>● Location data</td>
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<td>● Online identifier, such as a username</td>
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<td>It may also include factors specific to the individual’s physical, physiological, genetic, mental, economic, cultural or social identity.</td>
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<th>Special categories of personal data</th>
<th>Personal data which is more sensitive and so needs more protection, including information about an individual’s:</th>
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<td>● Racial or ethnic origin</td>
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<td>● Religious or philosophical beliefs</td>
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<td>● Trade union membership</td>
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<td>● Genetics</td>
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<td>● Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes</td>
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<td>● Health – physical or mental</td>
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<td>● Sex life or sexual orientation</td>
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### Term | Definition
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Processing | Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying. Processing can be automated or manual.

Data subject | The identified or identifiable individual whose personal data is held or processed.

Data controller | A person or organisation that determines the purposes and the means of processing of personal data.

Data processor | A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.

Personal data breach | A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

4. **The data controller**

   Our school processes personal data relating to parents, pupils, staff, governors, visitors and others, and therefore is a data controller. The school is registered as a data controller with the ICO and will renew this registration annually or as otherwise legally required.

5. **Roles and responsibilities**

   This policy applies to all staff employed by our school, and to external organisations or individuals working on our behalf. Staff who do not comply with this policy may face disciplinary action.

   **5.1 Governing board**

   The governing board has overall responsibility for ensuring that our school complies with all relevant data protection obligations.

   **5.2 Data protection officer**

   The data protection officer (DPO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable. They will provide an annual report of their activities directly to the governing board and, where relevant, report to the board their advice and recommendations on school data protection issues. The DPO is also the first point of contact for individuals whose data the school processes, and for the ICO. Full details of the DPO’s responsibilities are set out in the Service Level Agreement contract. Our DPO is contactable via the school, please address to the Data Protection Officer, Longford Park School, 74 Cromwell Road, Stretford Manchester M32 8QJ.

   **5.3 Headteacher**

   The headteacher acts as the representative of the data controller on a day-to-day basis.
5.4 All staff
Staff are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy
- Informing the school of any changes to their personal data, such as a change of address
- Contacting the DPO in the following circumstances:
  - With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure
  - If they have any concerns that this policy is not being followed
  - If they are unsure whether or not they have a lawful basis to use personal data in a particular way
  - If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the European Economic Area
  - If there has been a data breach
  - Whenever they are engaging in a new activity that may affect the privacy rights of individuals
  - If they need help with any contracts or sharing personal data with third parties

6. Data protection principles
The GDPR is based on data protection principles that our school must comply with. The principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary for the purposes for which it is processed
- Processed in a way that ensures it is appropriately secure

This policy sets out how the school aims to comply with these principles.

7. Collecting personal data
7.1 Lawfulness, fairness and transparency
We will only process personal data where we have one of 6 ‘lawful bases’ (legal reasons) to do so under data protection law:

- The data needs to be processed so that the school can **fulfil a contract** with the individual, or the individual has asked the school to take specific steps before entering into a contract
- The data needs to be processed so that the school can **comply with a legal obligation**
- The data needs to be processed to ensure the **vital interests** of the individual e.g. to protect someone’s life
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Privacy Notices to be published to Web/Prospectus/Induction Packs

- The data needs to be processed so that the school, as a public authority, can perform a task in the public interest, and carry out its official functions
- The data needs to be processed for the legitimate interests of the school or a third party (provided the individual’s rights and freedoms are not overridden)
- The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear consent

For special categories of personal data, we will also meet one of the special category conditions for processing which are set out in the GDPR and Data Protection Act 2018. If we offer online services to pupils, such as classroom apps, and we intend to rely on consent as a basis for processing, we will get parental consent (except for online counselling and preventive services).

Whenever we first collect personal data directly from individuals, we will provide them with the relevant information required by data protection law.

7.2 Limitation, minimisation and accuracy

We will only collect personal data for specified, explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data.

If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so, and seek consent where necessary.

Staff must only process personal data where it is necessary in order to do their jobs. When staff no longer need the personal data they hold, they must ensure it is deleted or anonymised. This will be done in accordance with the school’s record retention schedule/records management policy.

8. Sharing personal data

We will not normally share personal data with anyone else, but may do so where:
- There is an issue with a pupil or parent/carer that puts the safety of our staff at risk
- We need to liaise with other agencies – we will seek consent as necessary before doing this
- Our suppliers or contractors need data to enable us to provide services to our staff and pupils – for example, IT companies. When doing this, we will:
  - Only appoint suppliers or contractors which can provide sufficient guarantees that they comply with data protection law
  - Establish a data sharing agreement with the supplier or contractor, either in the contract or as a standalone agreement, to ensure the fair and lawful processing of any personal data we share
  - Only share data that the supplier or contractor needs to carry out their service, and information necessary to keep them safe while working with us

We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for:
- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax owed to HMRC
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
9. Subject access requests and other rights of individuals

9.1 Subject access requests

Individuals have a right to make a ‘subject access request’ to gain access to personal information that the school holds about them. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn’t possible, the criteria used to determine this period
- The source of the data, if not the individual
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual

Subject access requests must be submitted in writing, either by letter, email or fax to the DPO. They should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested

If staff receive a subject access request they must immediately forward it to the DPO.

9.2 Children and subject access requests

Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent.

Children below the age of 12 are generally not regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils at our school may be granted without the express permission of the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

9.3 Responding to subject access requests

When responding to requests, we:

- May ask the individual to provide 2 forms of identification
- May contact the individual via phone to confirm the request was made
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- Will respond without delay and within 1 month of receipt of the request
- Will provide the information free of charge
- May tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous. We will inform the individual of this within 1 month, and explain why the extension is necessary

We will not disclose information if it:
- Might cause serious harm to the physical or mental health of the pupil or another individual
- Would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child’s best interests
- Is contained in adoption or parental order records
- Is given to a court in proceedings concerning the child

If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which takes into account administrative costs.
A request will be deemed to be unfounded or excessive if it is repetitive, or asks for further copies of the same information.
When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO.

*Please see Appendix 3 – Subject Access Request Form. You do not have to use this form but doing so will make it easier for us to process your request quickly.*

9.4 Other data protection rights of the individual
In addition to the right to make a subject access request (see above), and to receive information when we are collecting their data about how we use and process it (see section 7), individuals also have the right to:
- Withdraw their consent to processing at any time
- Ask us to rectify, erase or restrict processing of their personal data, or object to the processing of it (in certain circumstances)
- Prevent use of their personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest
- Request a copy of agreements under which their personal data is transferred outside of the European Economic Area
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect them)
- Prevent processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Make a complaint to the ICO
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)
Individuals should submit any request to exercise these rights to the DPO. If staff receive such a request, they must immediately forward it to the DPO.

10. Parental requests to see the educational record
Parents, or those with parental responsibility, have a legal right to free access to their child’s educational record (which includes most information about a pupil) within 15 school days of receipt of a written request.

11. CCTV
We use CCTV in various locations around the school site to ensure it remains safe. We will adhere to the ICO’s code of practice for the use of CCTV. We do not need to ask individuals’ permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use. Any enquiries about the CCTV system should be directed to the DPO at the school.

12. Photographs and videos
As part of our school activities, we may take photographs and record images of individuals within our school. We will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil.

Uses may include:

- Within school on notice boards and in school magazines, brochures, newsletters, etc.
- Outside of school by external agencies such as the school photographer, newspapers, campaigns
- Online on our school website or social media pages

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further. When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.

See our Safeguarding Policy, Acceptable Use Policy, Information Security Policy, eSafety Policy, Communications Policy for more information on our use of photographs and videos.

14. Data protection by design and default
We will put measures in place to show that we have integrated data protection into all of our data processing activities, including:

- Appointing a suitably qualified DPO, and ensuring they have the necessary resources to fulfil their duties and maintain their expert knowledge
- Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection law (see section 6)
● Completing privacy impact assessments where the school’s processing of personal data presents a high risk to rights and freedoms of individuals, and when introducing new technologies (the DPO will advise on this process)

● Integrating data protection into internal documents including this policy, any related policies and privacy notices

● Regularly training members of staff on data protection law, this policy, any related policies and any other data protection matters; we will also keep a record of attendance

● Regularly conducting reviews and audits to test our privacy measures and make sure we are compliant

● Maintaining records of our processing activities, including:
  o For the benefit of data subjects, making available the name and contact details of our school and DPO and all information we are required to share about how we use and process their personal data (via our privacy notices)
  o For all personal data that we hold, maintaining an internal record of the type of data, data subject, how and why we are using the data, any third-party recipients, how and why we are storing the data, retention periods and how we are keeping the data secure

15. Data security and storage of records
We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.
In particular:

● Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data are kept under lock and key when not in use

● Papers containing confidential personal data must not be left on office and classroom desks, on staffroom tables, pinned to notice/display boards, or left anywhere else where there is general access

● Where personal information needs to be taken off site, staff must sign it in and out from the school office

● Passwords that are at least 8 characters long containing letters and numbers are used to access school computers, laptops and other electronic devices. Staff and pupils are reminded to change their passwords at regular intervals

● Encryption software is used to protect all portable devices and removable media, such as laptops and USB devices

● Staff, pupils or governors who store personal information on their personal devices are expected to follow the same security procedures as for school-owned equipment (see our policy on acceptable use)

● Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected (see section 8)
16. Disposal of records
Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.
For example, we will shred or incinerate paper-based records, and overwrite or delete electronic files. We may also use a third party to safely dispose of records on the school’s behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law. For further information please refer to our Data retention Policy.

17. Personal data breaches
The school will make all reasonable endeavours to ensure that there are no personal data breaches.
In the unlikely event of a suspected data breach, we will follow the procedure set out in our Data Breach Management Policy.

When appropriate, we will report the data breach to the ICO within 72 hours.
However, the breach has occurred, there are four important elements to any breach management plan and these are fully documented in our policy.
- Containment and Recovery
- Assessing the Risks
- Notification of breaches
- Evaluation and Response

18. Training
All staff and governors are provided with data protection training as part of their induction process.
Data protection will also form part of continuing professional development, where changes to legislation, guidance or the school’s processes make it necessary.

19. Monitoring arrangements
The DPO is responsible for monitoring and reviewing this policy.
This policy will be reviewed and updated if necessary when the Data Protection Bill receives royal assent and becomes law (as the Data Protection Act 2018) – if any changes are made to the bill that affect our school’s practice. Otherwise, or from then on, this policy will be reviewed every 2 years and shared with the full governing board.

20. Links with other policies
This data protection policy is linked to our:
- Freedom of information publication scheme
- Safeguarding Policy
- Acceptable Use Policy
- Information Security Policy
- Records Management Policy
- eSafety Policy
- Communications Policy
- Data Breach Management Policy
Appendix 1 – **DEFINITION OF PERSONAL DATA**

Personal data is information that relates to a living individual who can be identified from the information and which affects the privacy of that individual, either in a personal or professional capacity. Any expression of opinion about the individual or any indication of the intentions of any person in respect of the individual will be personal data.

Provided the information in question can be linked to an identifiable individual, the following are likely to be examples of personal data:

- An individual’s salary or other financial information
- Information about an individual’s family life or personal circumstances, employment or personal circumstances, any opinion about an individual’s state of mind
- Sensitive personal information – an individual’s racial or ethnic origin, political opinions, religious beliefs, physical or mental health, sexual orientation, criminal record and membership of a trade union.

The following are examples of information, which will not normally be personal data:

- Mere reference to a person’s name, where the name is not associated with any other personal information
- Incidental reference in the minutes of a business meeting of an individual’s attendance at that meeting in an official capacity
- Where an individual’s name appears on a document or email indicating only that it has been sent or copied to that particular individual
- The content of that document or email does not amount to personal data about the individual unless there is other information about the individual in it.

If a document has been sent by a third party, that contains information about an individual, which relates to their personal or professional life, it is personal data. An outline of an organisation’s standard procedure, relevant to an individual’s complaint/s29 case will not be personal data.

Further information can be found here;  
Appendix 2 – Privacy Notices

2.1 Privacy Notice for parents/carers
2.2 Privacy Notice for pupils
2.3 Privacy Notice for staff
2.4 Privacy Notice Website Disclaimer
2.5 Privacy Notice Privacy Notice for Outreach Behaviour Support Schools
2.6 Privacy Notice for Suppliers
Appendix 2.1 – Privacy Notice for Parents/Carers

Under data protection law, individuals have a right to be informed about how the school 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 pupils. We, Longford Park School, 74 Cromwell Road, Stretford Manchester M32 8QJ, are the ‘data controller’ for the purposes of data protection law. Our Data Protection Officer DPO is contracted to the school as part of a Service Level Agreement. You are able to contact them by writing to the school, your correspondence should be addressed to the Data Protection Officer.

The personal data we hold

Personal data relates to a natural living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession.

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

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school

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

Why we use this data

We use this data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare
- Assess the quality of our services
• Administer admissions waiting lists
• Carry out research
• Comply with the law regarding data sharing

**Our legal basis for using this data**
We only collect and use pupils’ personal data when the law allows us to. Most commonly, we process it where:

• We need to comply with a legal obligation
• We need it to perform an official task in the public interest

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

• We have obtained consent to use it in a certain way
• We need to protect the individual’s vital interests (or someone else’s interests)

Where we have obtained consent to use pupils’ 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 pupils' personal data overlap, and there may be several grounds which justify our use of this data.

**Collecting this information**
The school is the data controller. This means the Data Controller decides how your personal data is processed and for what purposes.

While the majority of information we collect about pupils 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**
We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Our Records Management Policy sets out how long we keep information about pupils.

Our Records Management Policy and all other school policies can be found on our website, under the heading of Key Information, Policies - page - http://www.longford.trafford.sch.uk/policies/

**Data sharing**
We do not share information about pupils 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 pupils with:

• Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
The Department for Education
The pupil’s family and representatives
Educators and examining bodies
Our regulator - Ofsted
 Suppliers and service providers – to enable them to provide the service we have contracted them for
Financial organisations
Central and local government
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, tribunals
Professional bodies

National Pupil Database
We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school.
Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.
The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.
The Department for Education may share information from the NPD with other organisations which promote children’s education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.
For more information, see the Department’s webpage on how it collects and shares research data.
You can also contact the Department for Education with any further questions about the NPD.

Transferring data internationally
Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Parents and pupils’ rights regarding personal data
Individuals have a right to make a ‘subject access request’ to gain access to personal information that the school holds about them.
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.
Parents also have the right to make a subject access request with respect to any personal data the school holds about them.
If you make a subject access request, and if we do hold information about you or your child, we will:
• Give you a description of it
• Tell you why we are holding and processing it, and how long we will keep it for
• Explain where we got it from, if not from you or your child
• Tell you who it has been, or will be, shared with
• Let you know whether any automated decision-making is being applied to the data, and any consequences of this
• Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact our data protection officer.

Parents/carers also have a legal right to access to their child’s educational record. To request access, please contact our data protection officer.

Other rights
Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

• Object to the use of personal data if it would cause, or is causing, damage or distress
• Prevent it being used to send direct marketing
• Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
• In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
• Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

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 write to the school:

For the Attention of the Data protection officer:
Longford Park School, 74 Cromwell Road, Stretford, Manchester M32 8QJ
Appendix 2.2 – Privacy Notice for Pupils

You have a legal right to be informed about how our school uses 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 you.

We, Longford Park School, 74 Cromwell Road, Stretford Manchester M32 8QJ, are the ‘data controller’ for the purposes of data protection law.

Our data protection officer supports the school with data protection and you can contact them at the school. See below for the contact details.

The personal data we hold
We hold 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:
- Your contact details
- Your test results
- Your attendance records
- Your characteristics, like your ethnic background or any special educational needs
- Any medical conditions you have
- Details of any behaviour issues or exclusions
- Photographs
- CCTV images

Why we use this data
We use this data to help run the school, including to:
- Get in touch with you and your parents when we need to
- Check how you’re doing in exams and work out whether you or your teachers need any extra help
- Track how well the school as a whole is performing
- Look after your wellbeing

Our legal basis for using this data
We will only collect and use your information when the law allows us to. Most often, we will use your information where:
- We need to comply with the law
- We need to use it to carry out a task in the public interest (in order to provide you with an education)

Sometimes, we may also use your personal information where:
- You, or your parents/carers have given us permission to use it in a certain way
- We need to protect your interests (or someone else’s interest)

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

Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.
Collecting this information
While 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. 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 pupil at our school. We may also keep it after you have left the school, where we are required to by law. We have a Records Management Policy which sets out how long we must keep information about pupils.

Our Records Management Policy and all other school policies can be found on our website, under the heading of Key Information, Policies - page - http://www.longford.trafford.sch.uk/policies/

Data sharing
We do not share personal information about you with anyone outside the school 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 pupils’ safety and exclusions
- The Department for Education (a government department)
- Your family and representatives
- Educators and examining bodies
- Our regulator (the organisation or “watchdog” that supervises us), Ofsted
- Suppliers and service providers – so that they can provide the services we have contracted them for
- Financial organisations
- Central and local government
- 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, tribunals
- Professional bodies

National Pupil Database
We are required to provide information about you to the Department for Education (a government department) as part of data collections such as the school census. Some of this information is then stored in the National Pupil Database, which is managed by the Department for Education 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 Department for Education 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 Department for Education’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 European Economic Area, we will protect your data by following data protection law.

Your rights
How to access personal information we hold about you
You can find out if we hold any personal information about you, and how we use it, by making a 'subject access request', as long as we judge that you can properly understand your rights and what they mean.

If we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you or your parents
- Tell you who it has been, or will be, shared with
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information

You may also ask us to send your personal information to another organisation electronically in certain circumstances.

If you want to make a request please contact our data protection officer.

Your other rights over your data
You have other rights over how your personal data is used and kept safe, including the right to:

- Say that you don’t want it to be used if this would cause, or is causing, harm or distress
- Stop it being used to send you marketing materials
- Say that you don’t want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it
- Claim compensation if the data protection rules are broken and this harms you in some way

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:

- 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 write to the school:-

**For the Attention of the Data protection officer:**
Longford Park School, 74 Cromwell Road, Stretford, Manchester M32 8QJ
Appendix 2.3 – Privacy Notice for Staff
Under data protection law, individuals have a right to be informed about how the school 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 at our school.
We, Longford Park School, 74 Cromwell Road, Stretford Manchester M32 8QJ, are the ‘data controller’ for the purposes of data protection law.
Our Data Protection Officer DPO is contracted to the school as part of a Service Level Agreement. You are able to contact them by writing to the school, your correspondence should be addressed to the Data Protection Officer.

The personal data we hold
Personal data relates to a natural living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession.

We process data relating to those we employ, or otherwise engage, to work at our school. 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, 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, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs
- CCTV footage
- Data about your use of the school’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
- 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 school, including to:

- Enable you to be paid
• 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
• Enable ethnicity and disability monitoring
• Improve the management of workforce data across the sector
• Support the work of the School Teachers’ Review Body

Our lawful basis for using this data
We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

• Fulfil a contract we have entered into with you
• Comply with a legal obligation
• Carry out a task in the public interest

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

• You have given us consent to use it in a certain way
• We need to protect your vital interests (or someone else’s interests)

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 school’s use of your data.

Collecting this information
The school is the data controller. This means the Data Controller decides how your personal data is processed and for what purposes.

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.

How we store this data
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.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our Records Management Policy.

Our Records Management Policy and all other school policies can be found on our website, under the heading of Key Information, Policies - page - http://www.longford.trafford.sch.uk/policies/
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 obligations to share certain information with it, such as safeguarding concerns and information about headteacher performance and staff dismissals
- The Department for Education
- Your family or representatives
- Educators and examining bodies
- Our regulator - Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Trade unions and associations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies

Transferring data internationally
Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Your rights
How to access personal information we hold about you
Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.
If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
Tell you who it has been, or will be, shared with

Let you know whether any automated decision-making is being applied to the data, and any consequences of this

Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact our data protection officer.

Your other rights regarding your data
Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

Object to the use of your personal data if it would cause, or is causing, damage or distress

Prevent your data being used to send direct marketing

Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)

In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing

Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

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

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please write to the school:

For the Attention of the Data protection officer:
Longford Park School, 74 Cromwell Road, Stretford, Manchester M32 8QJ
Appendix 2.4 – Website Disclaimer to be published on the website

Data Protection

Longford Park School is registered with the Information Commissioner under the terms of the Data Protection Act 1998. Longford Park School will ensure that:

- Personal data is only used for the legitimate interests of Longford Park School and does not unduly prejudice the rights and freedoms of the individual in question
- Personal data will be processed fairly and lawfully in accordance with the Data Protection Act 1998
- We will not process sensitive personal data without prior consent from the individual
- A hard copy of all data held on an individual will be made available following the receipt of a written request from the data subject, subject to exemptions
- Information processed is accurate, relevant, current, up to date and not excessive
- Personal data will be kept only for so long as is necessary for the specified purposes (but it should be noted that Alumnae Association membership is lifetime membership)

Please see our full Data Protection Policy for more information.

Disclaimer

Introduction

Longford Park School is a Community Special School maintained by the Local Authority. We meet the needs of pupils between the ages of 5-11 with different kinds of specific, complex, learning and social, emotional and behavioural difficulties.

We are committed to protecting any data that we collect concerning you. By using our services you agree to the use of the data that we collect in accordance with this Privacy Policy.

We collect the minimum amount of information about you that is commensurate with providing you with a satisfactory service. This Policy indicates the type of processes that may result in data being collected about you. Your use of this website gives us the right to collect that information.

Disclaimer

The information on this site is intended for general information purposes only and is not intended to serve as financial or other advice, nor as the basis of a contract. Your use of the website is at your risk. Longford Park School does not warrant or represent that Longford Park School's Material is accurate, error-free, truthful or reliable or that your use of Longford Park School's Material will not infringe rights of third parties. Longford Park School does not warrant that the functional use of the website will be error-free or that this website or the server that makes it available are free of viruses or other harmful components. If your use of this website or Longford Park School's Material results in the
need for servicing or replacing property, material, equipment or data, Longford Park School is not responsible for those costs. Without limiting the foregoing, everything on the website is provided to you “as is” and “as available” without warranty of any kind, either expressed or implied, including, but not limited to, the implied warranties of merchantability, satisfactory quality, fitness for a particular purpose, reasonable care and skill, or non-infringement. Longford Park School and its suppliers make no warranties about the accuracy, reliability, completeness, or timeliness of the Longford Park School material, software text, graphics, and links, or about results to be obtained from using the web site. Please note that some jurisdictions may not allow the exclusion of implied warranties, so some of the above exclusions may not apply to you.

Information Collected

We may collect any or all of the information that you give us depending on the type of transaction you enter into, including your name, address, telephone number and email address, together with data about your use of the website. Other information that may be needed from time to time to process a request may also be collected as indicated on the website.

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.

Information Use

We use the information collected primarily to process the task for which you visited the website. Data collected by us is held in accordance with the Data Protection Act. All reasonable precautions are taken to prevent unauthorised access to this information.

Contacting Us

If you have any questions about our Website Disclaimer, or if you want to know what information we have collected about you please direct your questions, concerns or requests for more information in writing to the school:-

For the Attention of the Data protection officer:
Longford Park School, 74 Cromwell Road, Stretford, Manchester M32 8QJ
Appendix 2.5 – Privacy Notice for Outreach Behaviour Support Schools

Under data protection law, our stakeholders have a right to be assured of our best practice when complying with the General Data Protection Regulation.

We comply with this right by providing ‘privacy notices’ (sometimes called ‘fair processing notices’) to our stakeholders where we are processing data that has been shared by them. This privacy notice explains how we collect, store and use personal data about pupils, families and possible their employees.

We, Longford Park School, 74 Cromwell Road, Stretford Manchester M32 8QJ, are the ‘data processor’ and ‘data controller’ for the purposes of data protection law. Our Data Protection Officer DPO is contracted to the school as part of a Service Level Agreement. You are able to contact them by writing to the school, your correspondence should be addressed to the Data Protection Officer.

The personal data we hold

Personal data relates to a natural living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession.

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

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school

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

Why we use this data

We use this data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare
• Assess the quality of our services
• Administer admissions waiting lists
• Carry out research
• Comply with the law regarding data sharing

Our legal basis for using this data
We only collect and use pupils’ personal data when the law allows us to. Most commonly, we process it where:

• We need to comply with a legal obligation
• We need it to perform an official task in the public interest

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

• We have obtained consent to use it in a certain way
• We need to protect the individual’s vital interests (or someone else’s interests)

Where we have obtained consent to use pupils’ 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 pupils’ personal data overlap, and there may be several grounds which justify our use of this data.

Collecting this information
The school is the data processor and data controller. Our stakeholders share information with us for the purpose of providing them with our Outreach Support and we process this information to provide this support. The school then becomes the Data Controller and will also compile its own data to deliver the support and intended outcomes, the school decides how the data is processed and for what purpose.

Under data protection legislation we are required to inform you that our lawful basis for processing sensitive information is in pursuit of our legitimate interests as a service providing you with behaviour outreach support.

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

Whenever we seek to collect information from you or the families concerned, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying and consent forms are provided for optional information.

How we store this data
All personal information is stored electronically and is kept while the pupil is of Primary Education age. We may also keep it beyond this in order to comply with our legal and safeguarding obligations. Our Records Management Policy sets out how long we keep information about pupils.
Our Records Management Policy and all other school policies can be found on our website, under the heading of Key Information, Policies - page -
http://www.longford.trafford.sch.uk/policies/

Data sharing
We do not share information about pupils with other 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 pupils with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- The Department for Education
- The pupil’s family and representatives
- Educators and examining bodies
- Our regulator - Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Financial organisations
- Central and local government
- 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, tribunals
- Professional bodies

Individuals, Parents and pupils' rights regarding personal data
Individuals have a right to make a 'subject access request' to gain access to the personal information that the school holds about them.
If a subject access request is received, we will respond by following our procedures and policies.

Other rights
Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. When gaining consent we will inform all parents whether their consent to use of information is mandatory or voluntary.

Voluntary consent would be considered as the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
• Claim compensation for damages caused by a breach of the data protection regulations

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/](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 write to the school:

**For the Attention of the Data protection officer:**
Longford Park School, 74 Cromwell Road, Stretford, Manchester M32 8QJ
Appendix 2.6 – Privacy Notice for Suppliers

Under data protection law, our stakeholders have a right to be assured of our best practice when complying with the General Data Protection Regulation.

We comply with this right by providing ‘privacy notices’ (sometimes called ‘fair processing notices’) to our stakeholders where we are processing data that has been shared by them. This privacy notice explains how we collect, store and use data about your company.

We, Longford Park School, 74 Cromwell Road, Stretford Manchester M32 8QJ, are the ‘data processor’ and ‘data controller’ for the purposes of data protection law. Our Data Protection Officer DPO is contracted to the school as part of a Service Level Agreement. You are able to contact them by writing to the school, your correspondence should be addressed to the Data Protection Officer.

The personal data we hold for your company is

The Company Name
Company Address
Phone Number
Email Address
Bank Details

Why we use this data
We use this data to process our orders and payment to you.

Our legal basis for using this data
We will never collect sensitive information about your company without your explicit consent.

Where we have obtained consent to your 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.

How we store this data
All personal information is kept secure and stored electronically on our management systems. This data is kept whilst you remain a supplier of the school or your withdraw consent.

Our Records Management Policy and all other school policies can be found on our website, under the heading of Key Information, Policies - page -
http://www.longford.trafford.sch.uk/policies/

Data sharing
We do not share information about your company with any other third party without consent.

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:
Contact us
If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please write to the school:-

For the Attention of the Data protection officer:
Longford Park School, 74 Cromwell Road, Stretford, Manchester M32 8QJ
Appendix 3 - SUBJECT ACCESS REQUEST FORM

You should complete this form if you want us to supply you with a copy of any personal data we hold about you. You are currently entitled to receive this information under the Data Protection Act 1998 (DPA) and will continue to be under the EU General Data Protection Regulation (GDPR), which comes into effect on 25 May 2018. We will also provide you with information about any processing of your personal data that is being carried out, the retention periods which apply to your personal data, and any rights to rectification, erasure, or restriction of processing that may exist. We will endeavour to respond promptly and in any event within one month of the latest of the following:

- Our receipt of your written request; or
- Our receipt of any further information we may ask you to provide to enable us to comply with your request.

The information you supply in this form will only be used for the purposes of identifying the personal data you are requesting and responding to your request. You are not obliged to complete this form to make a request but doing so will make it easier for us to process your request quickly.

SECTION 1: Details of the person requesting information

<table>
<thead>
<tr>
<th>Full Name</th>
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</thead>
<tbody>
<tr>
<td>Address</td>
<td></td>
</tr>
<tr>
<td>Contact Number</td>
<td></td>
</tr>
<tr>
<td>Email:</td>
<td></td>
</tr>
</tbody>
</table>

SECTION 2: Are you the data subject? Please tick the appropriate box and read the instructions which follow it.

☑ YES: I am the data subject. I enclose proof of my identity (see below). (go to section 4)

☐ NO: I am acting on behalf of the data subject. I have enclosed the data subject’s written authority (if child is of an appropriate age to do so) and proof of the data subject’s identity and my own identity (see below). (go to section 3)

To ensure we are releasing data to the right person we require you to provide us with proof of your identity and of your address. Please supply us with a photocopy or scanned image (do not send the originals) of one of both of the following:

- Proof of Identity Passport, photo driving licence, national identity card, birth certificate.
- Proof of Address Utility bill, bank statement, credit card statement (no more than 3 months old); current driving licence; current TV licence; local authority tax bill, HMRC tax document (no more than 1 year old). If we are not satisfied you are who you claim to be, we reserve the right to refuse to grant your request.
SECTION 3: Details of the data subject (if different from section 1)

<table>
<thead>
<tr>
<th>Full Name</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Address</td>
<td></td>
</tr>
<tr>
<td>Contact Number</td>
<td></td>
</tr>
<tr>
<td>Email:</td>
<td></td>
</tr>
</tbody>
</table>

SECTION 4: What information are you seeking?
Please describe the information you are seeking. Please provide any relevant details you think will help us to identify the information you require.

Please note that if the information you request reveals details directly or indirectly about another person we will have to seek the consent of that person before we can let you see that information. In certain circumstances, where disclosure would adversely affect the rights and freedoms of others, we may not be able to disclose the information to you, in which case you will be informed promptly and given full reasons for that decision. While in most cases we will be happy to provide you with copies of the information you request, we nevertheless reserve the right, in accordance with section 8(2) of the DPA, not to provide you with copies of information requested if to do so would take "disproportionate effort", or in accordance with Article 12 of the GDPR to charge a fee or refuse the request if it is considered to be "manifestly unfounded or excessive". However, we will make every effort to provide you with a satisfactory form of access or summary of information if suitable.

SECTION 5: Information about the collection and processing of data
If you want information about any of the following, please tick:

- [ ] Why we are processing your personal data
- [ ] To whom your personal data are disclosed
- [ ] The source of your personal data

SECTION 6: Declaration
Please note that any attempt to mislead may result in prosecution.
I confirm that I have read and understood the terms of this subject access form and certify that the information given in this application to Dynamic Training Ltd (DTL) or Hillingdon Training Ltd (HTL) is true. I understand that it is necessary for STL or HTL to confirm my / the data subject’s identity and it may be necessary to obtain more detailed information to locate the correct personal data.

Signed………………………………………………………………
Name Printed………………………………………………………
Dated………………………

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