

Learning Trust Academy

This notice is intended to provide information about how the Academy Sports and Leisure (referred to in this notice as “ASL”) will use or “process” personal data about individuals including current, past and prospective members.

Responsibility for Data Protection

The data controller for personal information held by ASL at Accrington Academy is United Learning Trust (ULT). ULT is registered with the Information Commissioner’s Office (ICO). The registration number is Z7415170.

The Company Secretary, Steve Whiffen, is responsible for ensuring that ULT complies with the Data Protection Law. He can be contacted on company.secretary@unitedlearning.org.uk or 01832 864538.

The Business Manager, Vicki Rush, is responsible for ensuring that the Academy complies with ULT’s policies and procedures in relation to Data Protection. She can be contacted on Victoria.rush@accrington-academy.org or 01254 304300.

The purposes for which we process personal data

ASL, Accrington Academy and United Learning Trust collect, create and hold personal information relating to the members. We use this personal data to:

- Provide leisure services, private bookings, gym classes and personal training.
- Progress training needs.
- To safeguard members and pupils’ welfare.
- To maintain relationships with the local community.
- For the purposes of management planning and forecasting, research and statistical analysis and to enable ULT to monitor the Academy and ASL’s performance.
- To monitor use of the Academy’s IT systems in accordance with the school’s Acceptable Use Policy.
- To confirm the identity of prospective and current members.
- To create invoices and process payments for services such as gym classes, block bookings, etc.
- For security purposes, and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations.
- To keep you updated about the activities of ASL including by sending updates and newsletters by email and post.

The categories of personal data held about members

The types of personal data processed by ASL will include:

1. Names, addresses, telephone numbers, email addresses and other contact details.
2. Personal characteristics such as your ethnic group, religious beliefs, any needs you may have and any relevant medical information.
3. Images captured by the Academy’s CCTV system.

The legal basis for the processing of member data

The 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 and where necessary to comply with our legal

obligations.

Information relating to racial or ethnic origin, religious beliefs or health (point 2) will only be processed with the explicit consent of the member when it is necessary for carrying out our legislative obligations.

Data Retention Periods

Members' information will be retained for 6 years.

Information relating to financial transactions will be kept for 7 years.

Data Security

ULT has in place technical and organisational measures that ensure a level of security appropriate to the sensitive nature of the personal data that we process.

Data Processors

We use third party data processors to provide us with a management information system, accounts software, cloud storage services, apps and software to facilitate the secure transfer of data. This use of data processors will only take place if it is in compliance with the Data Protection Act 1998 and the General Data Protection Regulation.

Decisions on whether we contract with these third party processors are subject to a robust approval process and are based on a detailed assessment of the purpose for which the data processing is required, the level and sensitivity of data involved and the arrangements in place to store and handle the data. To be granted access to member data, data processors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

We currently use the following data processors:

Microsoft	Legends
Access Dimensions	BookingPro
Focal Point	Tucassi

Sharing Data with Third Parties (other data controllers)

We may share data with the following recipients:

School Inspections

On request we will share ASL records with inspectors from Ofsted.

Department for Education

We are required, by law, to pass some information about our services to the Department for Education

(DfE). DfE may also share personal data that we supply to them, with third parties. This will only take place where legislation allows it to do so and it is in compliance with the Data Protection Act 1998 and the General Data Protection Regulation.

Decisions on whether DfE releases this personal data to third parties are subject to a robust approval process and are based on a detailed assessment of who is requesting the data, the purpose for which it is required, the level and sensitivity of data requested and the arrangements in place to store and handle the data. To be granted access to the data, requestors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

We will not give information about our members to any other third parties without your consent unless the law and our policies allow us to do so.

Rights of the Data Subject

Data protection legislation gives individuals certain rights which are detailed below. If you wish to exercise these rights please contact Victoria.rush@accrington-academy.org.

Right of access to personal data “subject access request”

You have the right to access the personal data that the school holds about you. Requests need to be made in writing. If your child is over the age of 12 they will also need to sign the request. We take the security of personal data seriously so we may ask you for proof of identity to verify that you are entitled to the information requested.

Right to withdraw consent

Where we have obtained your consent to specific processing activities you may withdraw this consent at any time.

Right to rectification

You have the right to have the personal data that we hold about you rectified if it is inaccurate or incomplete. We will respond to such requests within one month.

Right to erasure

You have the right to have personal data erased in certain specific circumstances. If you make such a request we will consider whether the right to erasure applies and give you a full and reasoned response.

Right to restrict processing

In certain circumstances you have the right to request that we restrict the processing of your personal data. If you make such a request we will consider whether the right to restrict processing applies and give you a full and reasoned response.

If you disagree with a decision that we have taken regarding the processing of your personal data please contact ULT’s Company Secretary, Steve Whiffen, on 01832 864538 or company.secretary@unitedlearning.org.uk.

You also have the right to lodge a complaint with the information Commissioners Office on 0303 123 1113 or <https://ico.org.uk/for-the-public/>.