

HULL ACTIVE SCHOOLS

GDPR Privacy Notice 2023/24

INTRODUCTION

Hull Active Schools primary school partnership manager is employed and currently hosted at Sirius Academy West (The Constellation Trust). The privacy policy for the Constellation Trust can be read here (<https://theconstellationtrust.org.uk/privacy-policy>).

Hull Active Schools secondary, special and alternative provision school manager is employed and currently hosted at St Mary's College (St Cuthbert's Catholic Academy Trust). The privacy policy for the St Cuthbert's Catholic Academy Trust can be read here (<http://www.stcuthbertshull.co.uk/upload/pdf/QyQd6cqKQhCmCkw.pdf>).

Hull Active Schools will, on some occasions, be required to obtain personal data in order to organise and deliver school sport events and competitions throughout the academic year. In doing so, our organisation is acting as a data controller and processor and will be lawfully required to ensure compliance with the GDPR from 25th May 2018.

The GDPR defines personal data as any information relating to an identified or identifiable natural living person. This includes information that is stored digitally, manually indexed or filed. The GDPR identifies certain special categories of personal data, which are considered sensitive and may not be processed unless an exception applies.

INFORMATION HULL ACTIVE SCHOOLS COLLECTS, HOLDS AND SHARES:

- **Student Personal information - young persons first name, initials and year group:** To ensure certain school sport competitions can take place we will collect first names or name initials, alongside which year group an individual currently within. This is collected to allow us to format a competition, accurately score and produce correct results for competitions. This personal information is destroyed on the day the event has taken place, once results have been formalised. We remove personal information when sharing results with our network. Personal information is also collected for any disciplinary issues, sanctions or exclusions in accordance with our safeguarding and disciplinary policy for each sport competition. On the rare occasion we must enforce our disciplinary procedures we will require student names, the school an individual attends and which year group they are within.
- **Student Ethnicity and Gender Characteristics:** We are required by national funding providers to report on gender and ethnicity characteristics at some of our events and competitions. This information is not processed alongside personal information data. These characteristics are reported as an overall figure from each competition or event. We collect this information from visiting school staff as a whole figure based on their student group upon registration.
- **School Staff Information:** Work related contact information for key school staff, such as email address or telephone numbers of your schools primary PE link, Headteacher, Safeguarding and Data Protection officer.
- **Health information:** We may require knowledge of such as details of any allergies or disabilities, plus details of additional personal and academic support required by pupils including Special Educational Needs where appropriate to ensure we can cater for all needs. Hull Active Schools do not under any circumstance hold or share this information. We rely on visiting school staff to be aware of this personal health information of their own students and to make event organisers aware of any specific needs on the day of an event. Two practical examples of this would be a primary school notifying Hull Active Schools ahead of a competition that one of their students requires access to adaptable sport equipment due to wheelchair use or if a secondary school notifies Hull Active Schools a student within their group has a severe allergy which we can share with other visiting school staff to limit risk of exposure. In all circumstances the health information is not collected alongside other identifiable personal information.

- **Photographic consent:** We do not obtain this consent directly. Schools affiliated to Hull Active Schools must obtain their own photographic consent prior to attendance. We ask visiting schools to notify us on the day of an event to make us aware of any young people who do not have photographic consent so we can make all visiting staff and schools aware.

WHY HULL ACTIVE SCHOOLS COLLECTS, HOLDS AND SHARES THIS INFORMATION

We use the personal data:

- to work collaboratively with our member schools
- to support member schools experience and involvement at our events
- to monitor and report on attendance records and engagement levels of schools
- to provide appropriate provision at our events i.e. health and safety requirements, capacity limits
- to safeguard pupil health and wellbeing
- to assess the quality of our services
- to investigate complaints and concerns
- to defend legal claims
- to work with local agencies and partners in the planning and delivery of school sport events

HULL ACTIVE SCHOOLS CONSENT

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 information to us or if you have a choice in this.

All Data will be safely destroyed immediately at an event or competition, or in disciplinary sanctions before the end of the academic year. However, in the instance of data required prior to specific events, this data will be removed from our records within 30 working days;

Hull Active Schools will only receive special category personal data after obtaining clear and unambiguous consent from individuals. We do not currently collect, hold or share any special category personal information as an organisation.

All personal data collected by Hull Active Schools will be processed by abiding by the following principles;

- **Processed lawfully, fairly and transparently**
- **Collected for specified, explicit and legitimate purposes**
- **Adequate, relevant and limited to what is necessary for processing**
- **Accurate and kept up to date**
- **Kept in a form that allows the identification of data subjects only as long as necessary**
- **Processed in a manner that ensures its security**

To further clarify Hull Active Schools obligations as data processor;

- We will set out clearly the purposes for which we are collecting personal data.
- These purposes will be clearly explained to data subjects (schools, staff, volunteers, parents and young people)
- Any changes will be communicated explicitly with schools.
- A privacy notice explaining who we are, how the data will be processed and if the data will be disclosed to any other parties will be shared.
- We will only collect enough personal data as is necessary for processing.
- Data collected will be accurate and kept up to date. This includes amending or erasing personal data when it is found to be inaccurate, or when a data subject informs us of any changes
- Personal data must only be kept in an identifiable form for as long as necessary for its intended purposes.
- Data will be processed in a manner that ensures its security to ensure protection against unauthorised or unlawful processing; and prevent accidental loss, damage or destruction

Written: September 2022

Reviewed: June 2023

- Hull Active Schools, as a data controller, is responsible for demonstrating compliance with the GDPR's data protection principles stated above and must therefore ensure that any data processors have measures in place to enable compliance with the GDPR.

SHARING PERSONAL DATA

On occasion, Hull Active Schools will be required to share data with competition and event organisers. We will ensure personal data is shared securely with other organisations, identifying clearly what the purpose of sharing data is and make data subjects fully aware of this request and consent obtained if appropriate. Examples of who we may share data with include;

- **National Governing Bodies of Sport.** An example would be Badminton England asking Hull Active Schools CIC to share how many young people attended our Badminton School competitions, the Gender and Ethnicity characteristics of this attendance group as a numerical data figure.
- **Sport clubs and delivery partners.** An example would be on the day of a Table Tennis school sport competition delivered by a local Table Tennis sport club, that club would require access to student names when compiling team score sheets on the day of an event to ensure the correct players play against the correct opponents. This personal data would be destroyed once match results are recorded.

RIGHTS OF DATA SUBJECTS

At any point data subjects have data protection rights under the GDPR which allow data subjects to take legal action against data controllers and data processors, and seek compensation for damages. Hull Active Schools will abide by the following rights when collecting or processing personal data:

- The right to be informed
- The right of access
- The right to rectification
- The right to restrict processing
- The right to object
- The right of access
- The right to erasure (to be forgotten)
- The right to data portability

Requesting access to personal data

Under data protection legislation, staff, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, contact;

Hull Active Schools Primary School Manager, Sirius Academy West, Anlaby Park Road, HULL, HU4 7JB – alex.sherwood@hullactiveschools.org

Hull Active Schools Secondary and Special School Development Manager, St Mary's College, Cranbrook Avenue, HULL, HU6 7TN – marridge@smchull.org

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;
- and

- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we request 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/>

Contact

If you would like to discuss anything in this GDPR privacy notice, please contact:
Hull Active Schools Primary Manager, 296 Anlaby Park Road, HULL, HU4 7JB