

1. Scope

All processing of personal data by White Rose Academies Trust is within the scope of this procedure.

2. Responsibilities

- 2.1 The Data Protection Officer / GDPR Owner is responsible for ensuring that the privacy notice(s) are correct and that mechanisms exist such as having the Privacy Notice(s) on the White Rose Academies Trust website and academy intranets to make all data subjects aware of the contents of this notice prior White Rose Academies Trust commencing collection of their data.
- 2.2 All staff that need to collect personal data are required to follow this procedure.

3. Procedure Article 12

- 3.1 White Rose Academies Trust identifies the legal basis for processing personal data before any processing operations take place by clearly establishing, defining and documenting:
 - 3.1.1 the specific purpose of processing the personal data and the legal basis to process the data under:
 - 3.1.1.1 consent obtained from the data subject;
 - 3.1.1.2 performance of a contract where the data subject is a party;
 - 3.1.1.3 legal obligation that White Rose Academies Trust is required to meet;
 - 3.1.1.4 protect the vital interests of the data subject, including the protection of rights and freedoms;
 - 3.1.1.5 official authority of White Rose Academies Trust or to carry out the processing that is in the public interest;
 - 3.1.1.6 necessary for the legitimate interests of the data controller or third party, unless the processing is overridden by the vital interests, including rights and freedoms;
 - 3.1.1.7 national law.
 - 3.1.2 any special categories of personal data processed and the legal basis to process the data under:
 - 3.1.2.1 explicit consent obtained from the data subject;
 - 3.1.2.2 necessary for employment rights or obligations;
 - 3.1.2.3 protect the vital interests of the data subject, including the protection of rights and freedoms;
 - 3.1.2.4 necessary for the legitimate activities with appropriate safeguards;
 - 3.1.2.5 personal data made public by the data subject;
 - 3.1.2.6 legal claims;
 - 3.1.2.7 substantial public interest;
- 3.2 White Rose Academies Trust records this information in line with its data protection impact assessment and data inventory ([GDPR DOC 2.4](#) and [GDPR REC 4.4](#)).

4. Privacy notices

- 4.1 When personal data collected from data subject with consent
 - 4.1.1 White Rose Academies Trust is transparent in its processing of personal data and provides the data subject with the following:
 - 4.1.1.1 White Rose Academies Trust's identity, and contact details of the Data Protection Officer / GDPR Owner and any data protection representatives;
 - 4.1.1.2 The purpose(s), including legal basis, for the intended processing of personal data (clause 4.2 below);
 - 4.1.1.3 Where relevant, White Rose Academies Trust's legitimate interests that provide the legal basis for the processing;
 - 4.1.1.4 Potential recipients of personal data;
 - 4.1.1.5 Any information regarding the intention to disclose personal data to third parties and whether it is transferred outside the EU. In such circumstances, White Rose Academies Trust will provide information on the safeguards in place and how the data subject can also obtain a copy of these safeguards;
 - 4.1.1.6 Any information on website technologies used to collect personal data about the data subject;
 - 4.1.1.7 Any other information required to demonstrate that the processing is fair and transparent.
 - 4.1.2 All information provided to the data subject is in an easily accessible format, using clear and plain language, especially for personal data addressed to a child.
 - 4.1.3 White Rose Academies Trust facilitates the data subject's rights in line with the data protection policy ([GDPR DOC 1.0](#)) and the subject access request procedure ([GDPR DOC 2.2](#)).
 - 4.1.4 Privacy notice for this personal data processing is recorded ([GDPR REC 4.1](#))
- 4.2 When data is contractually required for processing
 - 4.2.1 White Rose Academies Trust processes data without consent in order to fulfil contractual obligations such as personal details to process salaries, student personal details to process course studies, examinations etc.
 - 4.2.2 Privacy notice for this personal data processing is recorded (GDPR REC 4.1)
- 4.3 When personal data has been obtained from a source other than the data subject
 - 4.3.1 White Rose Academies Trust makes clear the types of information collected as well as the source of the personal data (publicly accessible sources) and provides the data subject with:
 - 4.3.1.1 White Rose Academies Trust's (data controller) identity, and contact details of the Data Protection Officer / GDPR Owner and any data protection representatives;
 - 4.3.1.2 The purpose(s), including legal basis, for the intended processing of personal data;
 - 4.3.1.3 Categories of personal data;
 - 4.3.1.4 Potential recipients of personal data;

- 4.3.1.5 Any information regarding disclosing personal data to third parties and whether it is transferred outside the EU – White Rose Academies Trust will provide information on the safeguards in place and how the data subject can also obtain a copy of these safeguards;
 - 4.3.1.6 Any other information required to demonstrate that the processing is fair and transparent.
- 4.3.2 Privacy notice for this personal data processing is recorded on White Rose Academies Trust website www.whiteroseacademies.org.uk (GDPR REC 4.1)

5. Provision of information

- 5.1 White Rose Academies Trust provides the information stated in clauses 3 and 4 above within:
- 5.1.1 one month of obtaining the personal data, in accordance with the specific circumstances of the processing;
 - 5.1.2 at the first instance of communicating in circumstances where the personal data is used to communicate with the data subject;
 - 5.1.3 when personal data is first disclosed in circumstances where the personal data is disclosed to another recipient.

Document owner and approver

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to members of staff, students and parents on the White Rose Academies staff and student intranets and the White Rose Academies Trust website.

This procedure is issued on a version controlled basis.

Change history

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	<Manager>	Xx/yy/zz