



## Privacy Policy

This privacy policy has been updated to reflect the requirements of the General Data Protection Regulation – GDPR. As an independent school, Footsteps collects personal information regarding Students, Parents, Teachers and Staff. This document explains the purpose Collection and processing of personal data and your rights with regard to such collection and use,

Please note: At the end of this document there is a list of rights under the GDPR. At all times, the safeguarding of children is an absolute priority. In view of this, concerns over GDPR should not compromise the procedures detailed within the safeguarding policy. Further, the right to view retained information is secondary to confidentiality in information regarding safeguarding.

Footsteps will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing a safe and efficient environment for staff and students in the process of education and related pursuits. The legal bases for doing so are as follows:

- Consent
- Legitimate interest
- Legal obligation
- Contractual obligation
- Public Interest

Where appropriate, Footsteps will seek specific consent in order to collect and process data relating to your health and any criminal convictions, to share data outside regular practice or publishing personal details or photographs.

Footsteps' legitimate interest in processing personal data is providing education services to both staff and students. Footsteps needs to check the identity of staff, their right to work, qualifications, and carry out the vetting checks required by law and the Department for Education as well as processing pay and managing entitlement to certain statutory rights. It is in the legitimate interests of all parties involved that Footsteps can process personal data.

### Recipients of data

Footsteps will process your personal data and/or sensitive personal data with the following recipients:

Client schools and referrers

- information required for the single central records (including vetting checks)
- references
- information relating to health if relevant to the role and in order that the school can consider whether any reasonable adjustments are necessary in order that you can work in the role.

Criminal records (unfiltered convictions, cautions, reprimands and warnings – both spent and unspent);

Safeguarding information including investigations and substantiated safeguarding allegations.

Third parties which provide, host and support our IT systems and services, subject to relevant checks and reports.

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Third parties in order to carry out the necessary vetting checks including:

- Former employers for the purposes of applying for references.
- Atlantic Data for the purposes of carrying out DBS checks.
- The Disclosure and Barring Service for the purposes of performing criminal records update checks.
- Teaching Regulation Agency in order to perform teacher status checks.
- Health professional for the purposes of assessing your physical and mental fitness to work in a school.
- Teachers' Pensions' Online Barred List Checker – Barred list.
- UK Visas and Immigration and the Home Office for checking right to work status.
- Overseas criminal records agencies.

### **Statutory/contractual requirement**

Certain personal data is required by law and is a necessary to enter into a contract with you for either employment or the provision of our services.

Footsteps is required by law to process certain of your personal data in order to be able to offer you employment. For example, we are under a legal obligation to carry out pre-engagement vetting checks including:

- verifying your physical and mental fitness to teach and work with children
- an enhanced DBS with barred list check, in order to verify your suitability to work in regulated activity with children
- verifying your right to work.

You are obliged to provide the personal data and if you do not the consequence of failure to provide the data is that we will be unable to complete your registration and provide employment.

### **Overseas Transfers**

Footsteps may transfer only the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing employment. We will take steps to ensure adequate protections are in place to ensure the security of your information.

### **Data retention**

Footsteps will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

We must keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Information regarding staff or students will not be retained without legal requirement unless there is an ongoing benefit to the individual concerned, for example, providing references for staff or application information for employment, college or university applications for students.

### **Please be aware that you have the following rights:**

- The right to be informed about the personal data Footsteps processes on you;
- The right of access to the personal data Footsteps processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate

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- interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to Footsteps processing your sensitive personal data you have the right to withdraw that consent at any time by contacting Footsteps' Data Protection Officer, listed below.

If you wish to complain about this privacy notice or any of the procedures set out in it please contact Footsteps' Data Protection Officer, listed below.

**Data Protection Officer**

Lee Martin – IT Officer  
[steve@footsteps.uk.com](mailto:steve@footsteps.uk.com)

**Complaints or queries**

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

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