

Website Privacy Policy

1. Introduction

- 1.1 This Policy describes how Attain Academy Partnership (herein referred to as the 'Trust'), its Academies and Strategic Partners safeguards the information of our website visitors. It explains how we comply with the GDPR (General Data Protection Regulation), the DPA (Data Protection Act 2018) and the PECR (Privacy and Electronic Communication Regulations).
- 1.2 Information collected whilst using this website will only be used in the ways described within this Privacy Policy.
- 1.3 This Policy is updated from time to time. The latest version will be published on this page. This website Privacy Policy was updated on: **23rd April 2022**.
- 1.4 If you have any questions about this policy, please email the Data Protection officer on DPO@attain.essex.sch.uk or write to Attain Academy Partnership, c/o Newlands Spring Primary and Nursery School, Dickens Place Chelmsford CM1 4UU

2. Who will be using the Data

- 2.1 **Data Controller:** Attain Academy Partnership
Data Processors: Newlands Spring Primary and Nursery School
Bocking Primary School
Cressing Primary School
de Vere Primary school
Elm Hall Primary School
Gosfield Community Primary School
Rayne Primary and Nursery School
Chelmsford Schools Partnership
Essex Primary SCITT

Data Protection Officer: Mrs Ellwood

- 2.2 Personal Data collected through our websites is not shared with everyone listed in this Privacy Notice. We only use and share data required for that particular function and only the minimum required.

3. What personal data we collect and how we use this data

- 3.1 We may collect website usage data. This may include cookies, IP address, geographical location, browser type and version, length of visit, page viewed and website navigation paths). The usage data may be processed for the purposes of analysing website use. The legal basis for this processing is our public interests, i.e. monitoring and improving our websites.
- 3.2 We may collect personal information through website Online forms, such as Booking Forms and 'Contact Us' Forms. This may include information such as name, job title, contact information including email address and other information relevant to client enquires. The legal basis for processing is our public interest and/or contractual purposes i.e. to respond to queries or manage bookings. Specifically, we may use the data
 - For our own internal records
 - To improve the service and products we provide
 - To contact you in response to a specific enquiry

Where collected, the personal information will not be collected without your express consent and will only be used in the ways described in this policy. The following

websites within the Trust use website 'Booking Forms' and/or 'Contact Us' forms in this manner:

- Chelmsford Schools Partnership
- Essex Primary SCITT

3.3 We may collect personal information when you choose to register an account on the website. This will include name, username, password and email. We may also collect additional information such as IP address, operating system or browser information when you interact with the website. The legal basis for processing is our public interest to ensure a valid logging on process for registered users and to ensure the security and authenticity of registered users and their data. The following websites permit users to register an account:

- Essex Primary SCITT

3.4 Where we have clearly stated and made you aware of the fact, and where you have given your express permission, we may use your details collected through the websites to send you promotional emails about products/service and other things we think might be of interest to you. This is done in accordance with the regulations named in this policy. The legal basis for this processing is our legitimate interests, namely the proper administration of our communications with users.

3.5 We may process information contained in or relating to any communication that you send to us. The correspondence data may include the communication content. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our public interest interests, namely the proper administration of our communications with users.

3.6 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is necessary for compliance with a legal obligation to which the controller is subject.

3.7 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legal obligation to protect our school against risks.

3.8 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

4. Data Sharing

4.1 Any data provided through online forms are sent directly to the Academy or Partner concerned. We will not disclose personal data to any Third Party outside of the Trust. We may disclose it within the Trust.

5. Retaining and deleting personal data

5.1 Personal data is kept for as long as it is required to fulfil the purpose for which it was collected after which time, subject to any exceptions laid out in the Attain Academy Partnership Data Protection Retention Policy, the data will be deleted. The Trust's Data Retention Schedule may be found on the Trust and the Academies/Strategic Partners websites.

6. Cookies and how we use them

6.1 A cookie is a small file containing an identifier that is sent by a web server to a web browser and is stored on your computer/device by the browser. It enables our website to identify your computer as you view different pages on our website.

- 6.2 Cookies may be either 'persistent' cookies or 'session cookies'. A persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 6.3 Web storage, is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored on your computer/device by the browser. Web storage supports persistent data storage, similar to cookies but with a greatly enhanced capacity and is more secure
- 6.4 By using our websites, you consent to our use of cookies and web storage in accordance with the terms of this policy.
- 6.5 Cookies do not typically contain any information that personally identifies a user however they can allow websites and applications to store a user's preferences in order to present content, options or functions that are relevant to them. They also enable organisations to see information like how many people use the website and what pages they tend to visit.
- 6.6 We use cookies for the following purpose:
- **Analysis:** to analyse web traffic and performance using an analytics package. Aggregated usage data helps us improve the website structure, design, content and functions.
 - **Status:** to identify whether a user is signed in to our website
 - **Authentication:** to recognise when a user returns to our website and as they navigate the website
 - **Security:** to protect user accounts, including fraudulent use of login credentials
 - **Cookie consent:** to store your preferences in relation to the use of cookies more generally.
- 6.7 You can find more information about the individual cookies we use and the purposes for which we use them in the list below:
- **_ga:** A Google Analytics cookie used to distinguish users and sessions.
 - **_gat:** A Google Analytics cookie used to determine new sessions / visits.
 - **-gid:** A Google Analytics cookie used to determine whether the user was in a new session/visit.
 - **JSESSIONID:** This cookie is used to store a session / visit identifier to determine session/visit counts
 - **wfvt_:** A wordfence cookie that tracks a users duration so that the pages can be grouped together.
- These are known as session cookies and are deleted when you leave the site.
- **Wordfence_verifiedHuman:** This cookie is used by Wordfence to verify whether the visitor is a bot or a human.
- 6.8 Where services such as Twitter or YouTube have been used on our websites, the providers will use cookies to run properly. You can view their privacy policy at (<https://help.twitter.com/en/rules-and-policies/twitter-cookies>) and <https://policies.google.com/technologies/cookies>.
- 6.9 Third Parties may also use cookies, over which we have no control. These are likely to be analytical/performance cookies or targeting cookies.
- 6.10 Users can use their web browser's cookie settings to determine how our website uses cookies. If you do not want our website to store cookies on your computer or device you should set your web browser to refuse cookies. However, please note that blocking all cookies may have a negative impact upon the usability of many websites and you may not be able to use all the features on our websites.

Unless you have changed your browser to refuse cookies, our website will issue cookies when you visit it.

6.11 To learn more about cookies and how to manage them, visit www.AboutCookies.org.uk.

Information is also available from

- <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-websitepreferences> (Firefox);
- <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-deletemanage-cookies> (Internet Explorer);
- <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-datasfri11471/> (Safari); and
- <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge)

7. Third Party Contractors

7.1 Attain Academy Partnership, its Academies and Strategic Partners may employ Third Party providers to process data on our behalf. Our website may contain links to the services provided by these providers. Access to the services on these websites is controlled. The types of information collected and processed for these services are described within the Privacy Notices published on the Trust / Academy website. A full list of Third Party providers of the Trust is also published on the website. Third party Providers linked to the websites include:

Attain Academy Partnership	Bocking Primary School	Cressing Primary school
New Era (DB Primary)	eSchools LGfL (FSM Eligibility Checker) New Era (DB Primary)	New Era (DB Primary) ESS Ltd (Pay350 by Capita) LGfL (FSM Eligibility Checker) 3P Learning (Mathletics) 2Simple (Purple Mash)
de Vere Primary School	Elm Hall Primary School	Gosfield Community Primary School
LGfL (FSM Eligibility Checker) New Era (DB Primary, School Ping)	New Era (DB Primary, School Ping) Capita Ltd (Reading Cloud – Junior Librarian) LGfL (FSM Eligibility Checker) Oxford University Press (MyMaths)	Primary Site LGfL (FSM Eligibility Checker) Renaissance Learning (Accelerated Reader)
Newlands Spring Primary School	Rayne Primary & Nursery School	Chelmsford Schools Partnership
New Era (DB Primary) ESS Ltd (Pay350 by Capita), LGfL (FSM Eligibility Checker) ParentPay Ltd (Schoolcomms:	New Era (DB Primary) ESS Ltd (Pay350 by Capita), LGfL (FSM Eligibility Checker) ParentPay Ltd (ParentMail)	N/A

Communication & Online bookings)		
Essex Primary SCITT		
UCAS		

Our Third Party providers use cookies and those cookies may be stored on your computer when you visit our website. Our websites do not control the dissemination of these cookies. You should check the Third Party websites for more information about these.

6. Subject Rights

6.1 Visitors to our Websites have following rights in relation to the processing of their data. You have the right to:

- be informed about how the Trust and/or the Academy/Strategic Partner use your personal data
- request access to the personal data the Trust and/or the Academy/Strategic Partner holds about them
- 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

Where the processing of data is based on consent, you have the right to withdraw this consent at any time.

6.2 If you object to our use of your personal data or want to request access to your personal data contact the DPO at Attain Academy Partnership

7. Links to other websites

7.1 Our website may contain links to other websites. Although we only look to include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout our websites.

7.2 We have no control of websites outside of the domains listed below:

- Attain.essex.sch.uk
- Bockingstreest.essex.sch.uk
- Chelmsfordteachingschoolsalliance.co.uk
- Cressingprimaryschool.co.uk
- devere.essex,sch,uk
- Elmhall.essex.sch.uk
- Essexprimaryscitt.co.uk
- Gosfield-pri.essex.sch.uk
- Newlandsspring.essex.sch.uk
- Rayne.essex.sch.uk

7.3 We cannot guarantee or verify the contents of any externally linked website despite our best efforts. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Notice.

You should exercise caution and read the data protection and Privacy Notices applicable to the website in question.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required to do so by law.

8. Concerns

8.1 If you have any concerns over the way we are asking for or using your personal data, please contact the Data Protection Officer at

Contact Attain Academy Partnership, c/o Newlands Spring Primary and Nursery School, Dickens Place, Chelmsford, Essex CM1 4UU

Email DPO@attain.essex.sch.uk

8.2 If you still have concerns following our response you have the right to raise the matter with the Information Commissioner's Office

Contact Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Email <https://ico.org.uk/concerns/handling/>

Phone 0303 123 1113