# Leicester-Shire & Rutland Sport (LRS) Fair Processing Notice for Team Leicestershire and School Games

This notice is to inform you as to why your information is required and how we (LRS) will handle it. This notice is for:

### Team Leicestershire and School Games Service (Active Schools Website)

LRS, a public sector organisation, is hosted by Leicestershire County Council (LCC) and this policy complies with LCCs data protection policy.
The following policy applies to the data uploaded by your school to the LRS Active Schools website and includes information about your pupils.
For the purpose of the Data Protection Act 2018, <u>you remain the data controller</u> of your school and pupil data. LRS are a data processor.

## What Information do we need from you?
We need to know the following about your school and pupils: school name, pupil name, gender, UPN, SEN status and year group, access to free school meals and attendance.

## Why are we allowed to process this information?
Data protection law allows us to process personal information with certain conditions. In this case we are using contract to provide a service to your school as the condition for us to do this.
We also need an appropriate lawful reason to processing sensitive data. In this case we are processing sensitive personal data because of substantial public interest in support of equalities of opportunity or treatment. We will also use the personal and special information for statistical analysis.

## Where we collect our information
We typically collect personal information about pupils when schools upload their pupil data via their account on our website, www.lrsactiveschools.org or on our affiliate websites. We also may collect personal information about pupils if you choose to manually enter teams into competitions.

**How we use the pupil information**
The table below describes the main purposes for which we process pupil's personal information, the categories of the information involved and our lawful basis for being able to do this.

| Purpose | Personal Information used | Lawful basis |
|---|---|---|
| To allow teachers to select their squads for competition | Pupil name | This is necessary to provide a service that enables teacher's to properly manage and administer their teams. |
| To conduct monitoring and evaluation studies for the purpose of demonstrating impact and improving services | Gender, SEN status, School name, Year group, ethnicity, free school meals, attendance. | Substantial public interest – equality of opportunity or treatment. Statistical analysis. |

**Who will we share this with?**
LRS does not share your personal information except in the limited circumstances described below:
We may share personal and non-personal information that is aggregated so that it cannot reasonably be used to identify an individual. We may disclose such information publicly and to third parties, for example, in public reports about exercise and activity, or to funding partners under agreement with us, for example, schools, Sport England and the local authorities of Leicestershire, Leicester and Rutland. Teachers of the school are the only individuals who can see the names of the pupils so that they can submit the teams for each competition. We only see pseudonymised data and only share anonymised statistical data.

**How we keep your data secure:**
Once pupil data has been uploaded, the CSV file is processed, encrypted on the server and then deleted routinely every 24 hours. The upload is processed through Hyper Text Transfer Protocol Secure (https), the same security methods used for online banking transactions. The encrypted student data is stored on a Rackspace Cloud Server in London. Student name and UPN is stored encrypted in MySQL using Advanced Encryption Standard (industry standard 'Rijndael 256'. The server runs on CentOS (Linux) and is regularly updated to ensure maximum security procedures are in place.

Where teachers have chosen a password which enables them to access certain parts of our site, they are responsible for keeping this password confidential. Your password provides access to your school's data (student names). We ask that passwords are not to be shared with anyone to protect this data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect the personal data, we cannot guarantee the security of the data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

**Your rights**
The school can update pupil data at any point and request removal of pupil data in the event. You may request to see a copy of the personal information we hold about you.
To exercise your rights to your Personal Data, please contact us at www.lrsport.org/contact or using the postal address, Leicester-Shire and Rutland Sport, SportPark, 3 Oakwood Drive, Loughborough, Leicestershire, LE11 3QF. We will respond to reasonable requests as soon as practicable, and in any event, within the time limits prescribed by law.

Leicestershire County Council

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Information security incidents will be investigated by LCCs Information and Security Team. Under GDPR/DPA 2018 we have to report most incidents to the Information Commissioners Office (ICO) within 72 hours of becoming aware of them.

If you are not satisfied with any response you may receive from us based on a complaint or concern about your personal information, you then have the option of contacting the Information Commissioners Office to take that complaint further.

The Information Commissioners Office does like to see that you have raised a complaint with agent first and received a response before contacting them. If you do wish to contact them, the address details can be found below: The Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF. Telephone: 0303 123 1113 (local rate) or 01625 545 745 (national rate). Website: www.ico.org.uk; Email: casework@ico.org.uk

**How long will we keep it for?**
We will only keep this information for as long as your school is using the service. Schools can control the deletion of old pupil data. This process can be completed at the same time as uploading new pupil data. To remove all pupil data from the system you will need to send in a request to LRS.
Monitoring and evaluation data at an anonymised statistical level will be kept for the duration of the programmes.

**What if something changes?**
If the information you provided changes schools simply need to re-upload their pupil data to overwrite what is already saved in the system.

**Links to other websites**
Our website may contain links to other websites of interest. However, you should note that we do not have any control over that other website. 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 statement. You should exercise caution and look at the privacy statement applicable to the website in question.

**Controlling your personal information**
We will never sell, distribute or lease any school or pupil personal information to third parties unless we have your permission or are required by law to do so.