

Oldham Schools Swimming Contract 2022/23

Statement of Data Processing



In meeting their national curriculum requirements for swimming, academies in Oldham have agreed a one year contract with Oldham Community Leisure Ltd for the provision of swimming.

This statement outlines the scope of the provision of personal data and the legal basis upon which we will provide it. For this purpose, OLC are defined as a data processor and The Harmony Trust as data controller.

Description	Details
Subject Matter Of The Processing	Transfer of pupil data from their primary school to Swimphony (cloud based software contracted to OLC to assist with the management of the swimming provision).
Duration Of The Processing	1 year until the 31st March 2023.
Nature And Purpose Of The Processing	<p>The personal data of the data subjects (pupils) will be securely uploaded by the pupil's primary school to Swimphony. The purpose of processing this data is</p> <ul style="list-style-type: none"> - to ensure appropriate supervision - to ensure pupil safety and well-being - record progress - recognise achievements <p>Further processing of the data will be undertaken by agreed, named, third parties, such as, but not limited to, Swimphony Ltd, Oldham Council and the School.</p> <p>Access to the data held on Swimphony will only be to OLC trained and approved staff. In all cases approval must be sought from the data controller.</p>
Type Of Personal Data	<p>The following types of pupil personal data may be processed:</p> <ul style="list-style-type: none"> - Family Name - Forename - DOB - SEN Status - Medical Conditions - Religion / Faith / Ethnicity <p>Additional types of data may be shared with the agreement of the data controller, as legally allowable and having consulted the DPO.</p>
Categories Of Data Subject	The data subjects include and are limited to: primary school pupils undertaking swimming lessons through their school but provided by OLC Ltd..
Plan For Return And Destruction Of The Data Once The Processing Is Complete Unless Requirement Under Union Or Member State Law To Preserve That Type Of Data	Data will only be retained for as long as is necessary for the purpose of managing the contract. Following confirmation that the transition process is complete the data will be securely deleted.

Data Statement Produced by the DPO Based On the Contract From OLC Ltd.

The legal basis upon which The Harmony Trust will process the data requested in this manner / form is : Legitimate Interest