



LIFE Education Trust

Learning Is For Everyone

Our Aim is that every School will be:

- An efficient school
- An effective School
- An enriching school
- An enabling school

Data Protection Policy

Policy	Data Protection Policy
Policy adopted by Trust Board	19/6/17
Reported to LGBs for implementation	19/6/17
Implementation Date	19/6/17
Review Date	June 2019
Policy Source	The Key

KEY DEFINITIONS USED IN THIS POLICY:

The Trust	LIFE Education Trust
The Board/Directors/Trust Board School/Trust school	The Board of Directors of LIFE Education Trust An Academy or school within LIFE Education Trust
Staff	All staff employed by LIFE Education Trust and working with academies, schools or units within LIFE Education Trust

All schools within the LIFE Education Trust are legally defined as academies, regardless of whether the term “school” is used to describe them in the following policy.

Introduction:

Our Academies collect and use certain types of personal information about employees, students, parents and other individuals who come into contact with our Academies in order to provide education and associated functions. In addition, it may be required by law to collect and use certain types of information to comply with statutory obligations of Local (Education) Authorities (LAs), government agencies and other bodies.

This policy is intended to ensure that personal information must be dealt with properly and securely and in accordance with the Data Protection Act 1998 (The Act) and other related legislation. It will apply to information regardless of the way it is used, recorded and stored and whether it is held in paper files or electronically.

Each Academy is the Data Controller under The Act.

The Academy’s Data Protection Officers are:

1. **Frances Bardsley Academy:** Mrs D Broom, Data Manager
2. **Benhurst Primary School:** Mrs S McCarthy, Data Manager
3. **The Bridge:** Mrs D Broom, Data Manager

Each will endeavour to ensure that all personal information is processed in compliance with this Policy and the Principles of the Data Protection Act 1998.

All staff involved with the collection, processing and disclosure of personal information will be aware of their duties and responsibilities within these guidelines.

Definitions:

“Processing” refers to any action involving personal information, including obtaining, viewing, recording, copying, amending, adding, deleting, extracting, storing, disclosing, destroying or otherwise using information.

In this policy any reference to students, parents and other individuals who come into contact with our Academies as part of the provision of education and associated functions of our Academies includes current, past or prospective students, parents and other individuals as described.

(For further information about the collection and use of data refer to our Privacy Notices. These documents can be found on each of our Academies' websites: www.fbaok.co.uk; www.benhurst@haverinq.sch.uk; www.lifeeducationtrust.com

Data Protection Principles:

Our Academies will comply with the Eight Data Protection Principles as laid down in the 1998 Data Protection Act which must be followed at all times:

1. Data must be processed fairly and lawfully.
2. Personal data to be processed for specified and lawful purposes that are compatible with the original purpose for which they were obtained.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose(s) for which they are processed.
4. Personal data shall be accurate and where necessary kept up to date.
5. Personal data processed for any purpose(s) shall not be kept for longer than is necessary for that purpose.
6. Personal data shall be processed in accordance with the rights of data subjects under the 1998 Data Protection Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country outside the EEA, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Our Academies are committed to maintaining these principles at all times. This means that they will

- tell you what purposes we will use information for when we collect it
- if information will be shared we will tell you why, with whom and under what circumstances
- check the quality and accuracy of the information we hold
- apply our records management policies and procedures to ensure that information is not held longer than is necessary
- ensure that when information is authorised for disposal it is done appropriately
- ensure appropriate security measures to safeguard personal information whether that is held in paper files or on our computer system
- share personal information with others only when it is necessary and legally appropriate to do so; set out clear procedures for responding to requests for access to personal information, known as subject access in the Data Protection Act
- train our staff so that they are aware of our policies and procedures

(This policy will be updated as necessary to reflect best practice or amendments made to the Data Protection Act 1998.)

Sensitive personal data:

The academies may, from time to time, be required to process sensitive personal data regarding an employee or a student, their parents or guardians. Sensitive personal data includes medical information and data relating to religion, race or criminal records and proceedings. Where sensitive personal data are processed by the academy, the explicit consent of the appropriate individual will generally be required in writing.

Access to personal information:

Employees, students and others in the trust academies have the right of access to any personal information that is being kept about them. A request to access personal data must be made in writing to the CEO.

Complaints:

Complaints should be made following the Complaints Policy. Complaints that involve consideration of personal data or sensitive personal data maybe referred to the Information Commissioner.

Contacts:

If you have any concerns or questions in relation to this policy please contact the CEO. Further advice and information, including a full list of exemptions, is available from the Information Commissioner's Office: www.ico.gov.uk.