United Learning Group Data Protection Policy

Scope

The policy set out in this document applies to all United Church Schools Trust (UCST) and United Learning Trust (ULT) schools and offices. The two companies (UCST and ULT) and its subsidiaries are referred to in this policy by their trading name, 'United Learning'.

Where this policy refers to 'School' or 'Head Teacher', within Central Office this should be interpreted to refer to the department where a member of staff works and their Head of Department.

As a values-led organisation our values of ambition, confidence, creativity, respect, enthusiasm and determination are key to our purpose and underpin all that we do.

Definitions

"Personal data" means any information relating to an identified or identifiable natural person ("data subject")

An **"identifiable person"** is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person

"Processing" means any operation or set of operations performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Policy Statement

United Learning values the personal information entrusted to us and will process personal data in accordance with the principles set out in the General Data Protection Regulation (UK GDPR). United Learning has put in place policies, procedures and guidance to ensure that we will always:

- determine the legal basis for the processing of personal data and document;
- be open with individuals about how we use their information and who we give it to;
- only process personal data in a manner consistent with the purpose for which it was collected;
- consider and address the privacy risks when we are planning to use or hold personal information in new ways, such as when introducing new systems;
- have processes in place to ensure the accuracy of personal data held;
- keep personal information to the minimum necessary and delete it when we no longer need it;
- have processes in place to enable individuals to exercise their rights as set out in the UK GDPR,

- have appropriate technical and organisational measures in place to make sure personal information is kept securely and only accessed on a need to know basis;
- provide training to staff who handle personal information and treat it as a disciplinary matter if they deliberately or recklessly misuse or don't look after personal information properly;
- put appropriate financial and human resources into looking after personal information.

Accountability

To enable United Learning to demonstrate compliance with the UK GDPR schools will implement the following Data Protection policies and procedures, and maintain appropriate records as required by these procedures:

1. Data protection roles and responsibilities
2. Privacy notice policy and appendices
3. Employee data protection policy
4. Policy for obtaining and recording consent and handling requests to withdraw consent
5. Rights of the data subject policy and guidance
6. Policy for responding to a subject access request
7. Policy for responding to a request for personal data from a third party
8. Policy on the application of exemptions to the UK GDPR
9. Procedure for disclosing information safely
10. Records Management Policy
11. Records Retention Schedule
12. Procedure for keeping records of data processing activities
13. Data minimisation policy
14. Information Security Policy
15. Security of personal data policy
16. Clear desk policy
17. Password Policy
18. Technology Handbook
19. Procedure for notification of a personal data security breach
20. Data sharing policy and procedure
21. Data Protection Impact Assessment policy, procedure and guidance

United Learning has a Data Protection Officer who is responsible for:

(a) providing information and advice to employees who carry out data processing regarding their obligations pursuant to UK GDPR and other relevant Data Protection Legislation and advising employees on the implementation of Group policies;
(b) monitoring the Group's compliance with
- the above policies and procedures,
- the assignment of responsibilities for the processing of personal data;

(c) ensuring there is a programme of awareness-raising and training of staff involved in data processing operations;
(d) to provide advice where requested as regards the data protection impact assessment and monitor the Group's performance pursuant to Article 35 UK GDPR;
(e) to cooperate with the Information Commissioner's Office;

(f) to act as the contact point for the Information Commissioner's Office on issues relating to processing, including the prior consultation referred to in Article 36 UK GDPR, and to consult, where appropriate, with regard to any other matter.

The Head Teacher must appoint an individual of sufficient seniority who will be the school's Data Protection Lead (DPL). The DPL will be responsible for:
(1) Implementing the above data protection policies and procedures at the school and ensuring that they are adhered to;
(2) Ensuring that all staff complete data protection training appropriate to their role including refresher training;
(3) The school keeps records to demonstrate compliance;
(4) Participating in data protection compliance audits conducted by central office;
(5) Responding to any requests by a data subject to exercise their rights under the UK GDPR.

In the event that the school does not have a DPL it is the Head Teacher's responsibility to ensure compliance.

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