



*Creative  
Education  
Trust*

# **Data Protection Policy**



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## 1. Introduction

- 1.1 Creative Education Trust aims to ensure that all personal data about staff, pupils, parents, governors, visitors and other individuals is collected, stored and processed by the Trust in accordance with the [General Data Protection Regulation \(GDPR\)](#)<sup>1</sup> and the expected provisions of the Data Protection Act 2018 (DPA 2018) as set out in the [Data Protection Bill](#)<sup>2</sup>.
- 1.2 This policy applies to all personal data, regardless of whether it is in paper or electronic format.

## 2. Legislation and guidance

- 2.1 This policy meets the requirements of the GDPR and the expected provisions of the DPA 2018. It is based on current guidance published by the Information Commissioner's Office (ICO) on the [GDPR](#)<sup>3</sup> and the ICO's [code of practice for subject access requests](#)<sup>4</sup>.
- 2.2 This policy also meets the requirements of the [Protection of Freedoms Act 2012](#) when referring to the use of biometric data in schools.
- 2.3 This policy also reflects the ICO's [code of practice](#) for the use of surveillance cameras i.e. CCTV and personal information.
- 2.4 In addition, this policy complies with our funding agreements and articles of association.

## 3. Definitions

Term	Definition
<b>Personal data</b>	<p>Any information relating to an identified, or identifiable, living individual.</p> <p>This may include the individual's:</p> <ul style="list-style-type: none"><li>• Name (including initials)</li><li>• Identification number</li><li>• Location data</li><li>• Online identifier, such as a username</li></ul> <p>It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.</p>

<sup>1</sup> <http://data.consilium.europa.eu/doc/document/ST-5419-2016-INIT/en/pdf>

<sup>2</sup> <https://publications.parliament.uk/pa/bills/cbill/2017-2019/0153/18153.pdf>

<sup>3</sup> <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

<sup>4</sup> <https://ico.org.uk/media/for-organisations/documents/2014223/subject-access-code-of-practice.pdf>



<b>Special categories of personal data</b>	<p>Personal data which is more sensitive and so needs more protection, including information about an individual's:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Political opinions</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetics</li> <li>• Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes</li> <li>• Health – physical or mental</li> <li>• Sex life or sexual orientation</li> </ul>
<b>Processing</b>	<p>Anything that is done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying. Processing may be automated or manual.</p>
<b>Data subject</b>	<p>The identified or identifiable individual whose personal data is held or processed.</p>
<b>Data controller</b>	<p>A person or organisation that determines the purposes and the means of processing of personal data.</p>
<b>Data processor</b>	<p>A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.</p>
<b>Personal data breach</b>	<p>A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.</p>

#### **4. The Data Controller**

- 4.1 Creative Education Trust processes personal data relating to parents, pupils, staff, governors, visitors and others, and therefore is a data controller.
- 4.2 The Trust is registered as a data controller with the ICO and will renew this registration annually or as otherwise legally required.

#### **5. Scope**

- 5.1 This policy applies to all staff employed by Creative Education Trust, and to external organisations or individuals working on our behalf. Staff who do not comply with this policy may be subject to disciplinary action.



## **6. Roles and responsibilities**

### **6.1 The Board of Directors**

6.1.1 The Board of Directors of Creative Education Trust has overall responsibility for ensuring that the Trust complies with all relevant data protection obligations.

### **6.2 The Data Protection Officer (DPO)**

6.2.1 The DPO is responsible for overseeing the implementation of this policy, monitoring Creative Education Trust's compliance with data protection law, and developing related policies and guidelines where applicable.

6.2.2 The DPO will provide an annual report of activities directly to the Board of Directors and, where relevant, report to the board advice and recommendations on school data protection issues.

6.2.3 The DPO is the point of contact with the ICO, and will offer advice and guidance to school data protection leads.

6.2.4 The Trust's DPO is Ellen Meyer and is contactable via [dpo@creativeeducationtrust.org.uk](mailto:dpo@creativeeducationtrust.org.uk) or by post at the following address: Data Protection Officer, Creative Education Trust, Sicilian House, 7 Sicilian Avenue, London, WC1A 2QR.

### **6.3 Principal/Headteacher**

6.3.1 The Principal/Headteacher acts as a representative of the data controller on a day-to-day basis.

### **6.4 School Data Protection Leads**

6.4.1 School data protection leads are the first point of contact and advice for any data protection concerns or issues at school level.

6.4.2 Details of the individual school's data protection lead are available on the front of this document and will also be available from the school office.

### **6.5 All employees**

6.5.1 Employees are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy.
- Ensure that any personal data they provide to the school (for example, their contact details) is accurate.
- Informing the school of any changes to their own personal data, such as a change of address.



- Be mindful of the fact that individuals have the right to see their 'personal data'. Therefore, employees should not record comments or other data about individuals, which they would not be comfortable in the individual seeing, either in emails or elsewhere.
- Not covertly or without permission record (video or audio) pupils, staff, or other individuals.
- Only ever obtain or use personal data relating to third parties for approved work purposes.
- Take appropriate initial action to minimise the impact of a potential data breach. E.g. if an email containing personal data has been sent to an incorrect recipient, the email must be recalled immediately, and the school data protection lead and IT informed.
- Contacting the school data protection lead in the first instance in the following circumstances:
  - With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure.
  - If they have any concerns that this policy is not being followed.
  - If they are unsure whether or not they have a lawful basis to use personal data in a particular way.
  - If they need to rely on or capture consent, deal with data protection rights invoked by an individual, or transfer personal data outside the European Economic Area.
  - If there has been a data breach.
  - Whenever they are engaging in a new activity that may affect the privacy rights of individuals.
  - If they need help with any contracts or sharing personal data with third parties.
  - If they find any lost or discarded data which they believe contains personal data, (for example, may include a memory stick).
  - If they become aware that personal data has been accidentally lost or stolen or inadvertently disclosed. For example, if their laptop is stolen or their phone is lost and it has personal data stored on it.

## **6. Data protection principles**

6.1 The GDPR is based on data protection principles that all organisations must comply with.

6.2 The principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner.
- Collected for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed.
- Accurate and, where necessary, kept up to date.
- Kept for no longer than is necessary for the purposes for which it is processed.
- Processed in a way that ensures it is appropriately secure.



6.3 This policy sets out how Creative Education Trust and each of its schools aims to comply with these principles.

## 7. Collecting personal data

### 7.1 *Lawfulness, fairness and transparency*

7.1.1 Personal data will only be processed, where one of 6 'lawful bases' (legal reasons) exists to do so under data protection law:

- The data needs to be processed so that Creative Education Trust or an individual school can **fulfil a contract** with the individual, or the individual has asked the Trust or school to take specific steps before entering into a contract.
- The data needs to be processed so that the Trust or school can **comply with a legal obligation**.
- The data needs to be processed to ensure the **vital interests** of the individual e.g. to protect someone's life.
- The data needs to be processed so that the Trust or school, as a public authority, can perform a task **in the public interest**, and carry out its official functions.
- The data needs to be processed for the **legitimate interests** of the Trust or school or a third party (provided the individual's rights and freedoms are not overridden).
- The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear **consent**.

7.1.2 For special categories of personal data, one of the special category conditions for processing will also be met, as set out in the GDPR and Data Protection Act 2018.

7.1.3 At the Trust's primary schools, if online services are offered to pupils, such as classroom apps, and the school intends to rely on consent as a basis for processing, parental consent will be obtained (except for online counselling and preventive services).

7.1.4 At the Trust's secondary schools, if online services are offered to pupils, such as classroom apps, and the school intends to rely on consent as a basis for processing, parental consent will be obtained where the pupil is under 13 (except for online counselling and preventive services).

7.1.5. Whenever personal data is collected directly from individuals, those individuals will be provided with the relevant information required by data protection law.

### 7.2 *Limitation, minimisation and accuracy*

7.2.1 Personal data will only be collected for specified, explicit and legitimate reasons. These reasons will be explained to the individuals when their data is first collected.



7.2.2 If Creative Education Trust or school wishes to use personal data for reasons other than those given when it was first obtained, the individuals concerned will be informed before this takes place, and consent sought where necessary.

7.2.3 Staff must only process personal data where it is necessary in order to do their jobs. When staff no longer need the personal data they hold, they must ensure it is appropriately deleted. This will be done in accordance with Creative Education Trust's Records Management Policy.

## **8. Sharing personal data**

8.1 Personal data will not normally be shared with any other parties. However, exceptions to this are where:

- There is an issue with a pupil or parent/carer that puts the safety of Creative Education Trust's staff at risk.
- The Trust or the school need to liaise with other agencies. If required, consent will be sought in advance.
- The Trust or school or individual suppliers or contractors need data to enable the provision of services to our staff and pupils – for example, IT companies. When doing this, the Trust and individual schools will:
  - Only appoint suppliers or contractors which can provide sufficient guarantees that they comply with data protection law.
  - Establish a data sharing agreement with the supplier or contractor, either in the contract or as a standalone agreement, to ensure the fair and lawful processing of any personal data that is shared.
  - Only share data that the supplier or contractor needs to carry out their service, and information necessary to keep them safe while working with the Trust or the school.

8.2 Creative Education Trust and individual schools will also share personal data with law enforcement and government bodies where there is a legal requirement to do so, including for:

- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax owed to HMRC
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided

8.3 Creative Education Trust and individual schools may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of the Trust's pupils or staff.

8.4 Where personal data is transferred to a country or territory outside the European Economic Area, this will be done in accordance with data protection





law.

## **9. Subject access requests and other rights of individuals**

### **9.1 Subject access requests**

9.1.1 Individuals have a right to make a 'subject access request' to gain access to personal information that is held about them. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- The source of the data, if not the individual
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual

9.1.2 Subject access requests must be submitted in writing, either by letter or email to the school data protection lead and copied to the Creative Education Trust's DPO. Requests should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested

9.1.3 If staff receive a subject access request they must immediately forward it to the school data protection lead and the DPO.

### **9.2 Children and subject access requests**

9.2.1 Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent.

9.2.2 Children below the age of 12 are generally not regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils attending Creative Education Trust primary schools may be granted without the express permission of the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

9.2.3 Children aged 12 and above are generally regarded to be mature enough to understand their rights and the implications of a subject access request.



Therefore, most subject access requests from parents or carers of pupils attending Creative Education Trust secondary schools may not be granted without the express permission of the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

### **9.3 Responding to subject access requests**

#### 9.3.1 When responding to requests:

- The individual may be asked to provide two forms of identification.
- The individual may be contacted via telephone to confirm the request was made.
- The Trust or individual school will respond without delay and within one month of receipt of the request.
- The information will be provided free of charge.
- If the request is complex or numerous, the individual may be told that we will comply within three months of receipt of the request. The individual will be informed of this within one month, and provided with an explanation of why the extension is necessary.

#### 9.3.2 Information may not be disclosed if it:

- Might cause serious harm to the physical or mental health of the pupil or another individual
- Would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child's best interests
- Is contained in adoption or parental order records
- Is given to a court in proceedings concerning the child

9.3.3 If the request is unfounded or excessive, the Trust or individual school may refuse to act on it, or charge a reasonable fee which takes into account administrative costs.

9.3.4 A request will be deemed to be unfounded or excessive if it is repetitive, or asks for further copies of the same information.

9.3.5 When a request is refused, the individual will be provided with the reasons for the refusal, and informed of their right to complain to the ICO.

### **9.4 Other data protection rights of the individual**

9.4.1 In addition to the right to make a subject access request (see above), and to receive information when data is being collected, about how it is used and processed (see section 7), individuals also have the right to:

- Withdraw their consent to processing at any time.
- Ask the Trust or the individual school to rectify, erase or restrict processing of their personal data, or object to the processing of it (in certain circumstances).



- Prevent use of their personal data for direct marketing.
- Challenge processing which has been justified on the basis of public interest.
- Request a copy of agreements under which their personal data is transferred outside of the European Economic Area.
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect them).
- Prevent processing that is likely to cause damage or distress.
- Be notified of a data breach in certain circumstances.
- Make a complaint to the ICO.
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

9.4.2 Individuals should submit any request to exercise these rights to the data protection lead at the school copying the DPO. If staff receive such a request, they must immediately forward it to the school's data protection lead and copy it to the DPO.

## **10. Parental requests to see the educational record**

10.1 There is no automatic parental right of access to the educational record in academies, including free schools. If a parent wishes access to the educational record then they should follow the subject access request process as set out in section 9.

## **11. Biometric recognition systems**

11.1 Where pupils' biometric data is used as part of an automated biometric recognition system (for example, pupils use finger prints to receive school dinners instead of paying with cash), the school will comply with the requirements of the [Protection of Freedoms Act 2012](#). In the context of the Protection of Freedoms Act 2012, a 'child' means any individual under the age of 18.

11.2 Parents/carers will be notified before any biometric recognition system is put in place or before their child first takes part in it. The school will get written consent from at least one parent or carer before any biometric data is taken from their child.

11.3 Parents/carers and pupils have the right to choose not to use the school's biometric system(s). The school will provide alternative means of accessing the relevant services for those pupils.

11.4 Parents/carers and pupils can object to participation in the school's biometric recognition system(s), or withdraw consent, at any time, and the school will make sure that any relevant data already captured is deleted.



- 11.5 As required by law, if a pupil refuses to participate in, or continue to participate in, the processing of their biometric data, that data will not be processed irrespective of any consent given by the pupil's parent(s)/carer(s).
- 11.6 Where staff members or other adults use the school's biometric system(s), their consent will also be obtained before they first use the system. Adults will also be provided with alternative means of accessing the relevant service if they object. Staff and other adults can also withdraw consent at any time, and the school will delete any relevant data already captured.

## **12. CCTV**

- 12.1 Creative Education Trust schools use CCTV in various locations around school sites to ensure they remain safe and secure. When CCTV is used, the school will adhere to the ICO's [code of practice](#) for the use of CCTV.
- 12.2 It is not necessary to ask individuals' permission to use CCTV, but each school will make it clear where individuals are being recorded. Security cameras will be clearly visible and accompanied by prominent signs explaining that CCTV is in use.
- 12.3 Any enquiries about the CCTV systems within Trust schools should be directed to the individual school's data protection lead in the first instance.

## **13. Photographs and videos**

- 13.1 As part of school and Creative Education Trust activities, photographs may be taken and images recorded of individuals.
- 13.2 In the Trust's primary schools, written consent will be obtained from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil.
- 13.3 In the Trust's secondary schools, written consent will be obtained from parents/carers, or pupils aged 18 and over, for photographs and videos to be taken of pupils for communication, marketing and promotional materials. Where parental consent is required, it will be clearly explained how the photograph and/or video will be used to both the parent/carer and pupil. Where it is not necessary to gain parental consent, we will clearly explain to the pupil how the photograph and/or video will be used.
- 13.4 Uses may include:
- Within the individual pupil's school or other Creative Education Trust schools or the Trust's offices on notice boards and in school and Trust magazines, brochures, newsletters, etc.



- Outside of school by external agencies such as the school photographer, newspapers, campaigns.
- Online on the school or Trust website or social media pages

13.5 Consent can be refused or withdrawn at any time. Where consent is withdrawn it may not always be possible for the school or the Trust to remove all images of the pupil from communication, marketing and promotional materials.

13.6 If the school or Creative Education Trust wish to use a pupil's image linked to their full name (for example, a pupil child being named in press/literature to celebrate an achievement), parents will be contacted separately for permission.

#### **14. Data protection by design and default**

14.1 Measures will be put in place to show that data protection has been integrated into all of the Creative Education Trust's data processing activities, including:

- Appointing a suitably qualified DPO, and ensuring they have the necessary resources to fulfil their duties and maintain their expert knowledge.
- Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection law (see section 6).
- Completing privacy impact assessments where the Trust's or the individual school's processing of personal data presents a high risk to rights and freedoms of individuals, and when introducing new technologies.
- Integrating data protection into internal documents including this policy, any related policies and privacy notices.
- Training staff on data protection.
- Regularly conducting reviews and audits to test privacy measures and ensure compliance.
- Maintaining records of processing activities, including:
  - For the benefit of data subjects, making available the name and contact details of our school data protection lead and the Trust's DPO and all information that Creative Education Trust is required to share about how their personal data is used and processed (via individual privacy notices).
  - For all personal data that we hold, maintaining an internal record of the type of data, data subject, how and why we are using the data, any third-party recipients, how and why we are storing the data, retention periods and how we are keeping the data secure.

#### **15. Data security and storage of records**

15.1 Personal data will be protected and kept safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.

15.2 In particular, members of staff should adhere to the E-Safety Policy and ICT

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Acceptable Use Policy in relation to the security of electronic records. Employees should take appropriate steps to ensure the security of paper records for example, through locking away confidential papers when not in use, and ensuring confidential data is not left on office and classroom desks, on staffroom tables, pinned to notice/display boards, or left anywhere else where there is general access.

## **16. Disposal of records**

- 16.1 Personal data that is no longer needed will be disposed of securely. For further details, see Creative Education Trust's Records Management Policy.

## **17. Personal data breaches**

- 17.1 The Trust and each individual school will make all reasonable endeavours to ensure that there are no personal data breaches.
- 17.2 In the unlikely event of a suspected data breach, the procedure set out in appendix 1 will be followed.
- 17.3 When appropriate, data breaches will be reported to the ICO within 72 hours.
- 17.4 Such breaches in a school context may include, but are not limited to:
- A non-anonymised dataset being published on the school website which shows the exam results of pupils eligible for the pupil premium.
  - Safeguarding information being made available to an unauthorised person.
  - The theft of a school laptop containing non-encrypted personal data about pupils.

## **18. Training**

- 18.1 All staff will be provided with data protection training as part of their induction process.
- 18.2 Data protection will also form part of continuing professional development, where changes to legislation, guidance or the school's processes make it necessary.

## **19. Monitoring arrangements**

- 19.1 The DPO is responsible for monitoring and reviewing this policy.
- 19.2 This policy will be reviewed and updated if necessary when the Data Protection Bill receives royal assent and becomes law (as the Data Protection Act 2018) – if any changes are made to the bill that affect school's practice. Otherwise, or



from then on, this policy will be reviewed every two years.

## **20. Links with other policies**

- 20.1 This data protection policy is linked to our:
- Freedom of Information Policy and Publication Scheme
  - E-Safety Policy
  - ICT Acceptable Use Policy
  - Records Management Policy



## Appendix 1: Personal data breach procedure

This procedure is based on [guidance on personal data breaches](#)<sup>5</sup> produced by the ICO.

- On finding or causing a breach, or potential breach, the staff member or data processor must immediately notify the school data protection lead.
- The school data protection lead will immediately inform the Principal/Headteacher and the Trust's DPO.
- The DPO will convene a meeting of the incident response team. The membership of the team will depend on the nature of the potential breach, but will usually include the DPO, the Principal/Headteacher, the school data protection lead, Head of ICT, Director of Human Resources.
- The potential breach will be investigated to determine whether a breach has occurred. To decide, consideration will be given as to whether personal data has been accidentally or unlawfully:
  - Lost
  - Stolen
  - Destroyed
  - Altered
  - Disclosed or made available where it should not have been
  - Made available to unauthorised people
- The incident response team will make all reasonable efforts to contain and minimise the impact of the breach, assisted by other relevant staff members or data processors where necessary (actions relevant to specific data types are set out at the end of this procedure).
- The incident response team will assess the potential consequences, based on how serious they are, and how likely they are to happen.
- A decision will be made as to if the breach must be reported to the ICO. This will be judged on a case-by-case basis. To decide, consideration will be given as to whether the breach is likely to negatively affect people's rights and freedoms, and cause them any physical, material or non-material damage (e.g. emotional distress), including through:
  - Loss of control over their data
  - Discrimination
  - Identify theft or fraud
  - Financial loss
  - Unauthorised reversal of pseudonymisation (for example, key-coding)
  - Damage to reputation
  - Loss of confidentiality
  - Any other significant economic or social disadvantage to the individual(s) concerned

If it is likely that there will be a risk to people's rights and freedoms, the DPO will notify the ICO.

- Where the ICO must be notified, the DPO will do this via the ['report a breach' page of the ICO website](#) within 72 hours. As required, the DPO will set out:

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<sup>5</sup> <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/>





- A description of the nature of the personal data breach including, where possible:
  - The categories and approximate number of individuals concerned
  - The categories and approximate number of personal data records concerned
- The name and contact details of the DPO
- A description of the likely consequences of the personal data breach
- A description of the measures that have been, or will be taken, to deal with the breach and mitigate any possible adverse effects on the individual(s) concerned
- If all the above details are not yet known, the DPO will report as much as they can within 72 hours, and submit the remaining information as soon as possible.
- The DPO will also assess the risk to individuals, again based on the severity and likelihood of potential or actual impact. If the risk is high, the DPO will promptly inform, in writing, all individuals whose personal data has been breached. This notification will set out:
  - The name and contact details of the DPO
  - A description of the likely consequences of the personal data breach
  - A description of the measures that have been, or will be, taken to deal with the data breach and mitigate any possible adverse effects on the individual(s) concerned
- The DPO will notify any relevant third parties who can help mitigate the loss to individuals – for example, the police, insurers, banks or credit card companies
- The DPO will document each breach, irrespective of whether it is reported to the ICO. For each breach, this record will include the:
  - Facts and cause
  - Effects
  - Action taken to contain it and ensure it does not happen again (such as establishing more robust processes or providing further training for individuals)

Records of all breaches will be stored by the DPO on a secure section of the CETcloud.

- The incident response team will meet to review what happened and how it can be prevented from happening again. This meeting will happen as soon as reasonably possible.