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Daubeney Academy



Data Protection Policy

Date approved:	July 2020
Approved by:	CMAT Board
Date of next review:	July 2021

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1. Definitions

- 1.1. "Personal data" means any information relating to an identified or identifiable natural person ("data subject")
- 1.2. 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
- 1.3. "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.

2. Policy Statement

- 2.1. Challenger Multi-Academy Trust 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 (GDPR).
- 2.2. CMAT 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 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.

3. Policies and procedures

- 3.1. To enable CMAT to demonstrate compliance with the GDPR schools will implement the following Data Protection policies and procedures, and maintain appropriate records as required by these procedures:
- CMAT Staff Data Protection Policy
 - Staff Privacy Notice
 - Parent Privacy Notice
 - Pupil Privacy Notice
 - Information and Records Retention Policy
 - Data Breach Policy
 - Information Security Policy

4. Responsibilities of the Data Protection Officer (DPO)

- 4.1. CMAT has a designated Data Protection Officer.
- 4.2. The DPO is responsible for providing information and advice to employees who carry out data processing regarding their obligations under GDPR and other relevant Data Protection Legislation and advising employees on the implementation of CMAT policies.
- 4.3. The DPO will monitor compliance with CMAT policies and procedures.
- 4.4. The DPO will provide advice with regards to Data Protection Impact Assessments and monitor compliance with Article 35 GDPR.
- 4.5. The DPO will maintain a central log of data breaches, incidents, or near-misses and will co-operate with the Information Commissioner's Office where necessary.
- 4.6. The DPO will consult with legal experts where necessary for any data protection related matters.

5. Responsibilities of the Data Protection Lead (DPL)

- 5.1. The Head Teacher of each CMAT academy must appoint an individual of sufficient seniority who will be the school's Data Protection Lead (DPL). In the event that the school does not have a DPL it is the Head Teacher's responsibility to ensure compliance.
- 5.2. The DPL is responsible for implementing the above policies and procedures and ensuring they are adhered to
- 5.3. The DPL will ensure all staff complete data protection training appropriate to their role including refresher training.
- 5.4. The DPL will ensure the school keeps records to demonstrate compliance
- 5.5. The DPL will ensure the school participates in any data protection compliance audits as required by the Trust

- 5.6. The DPL is responsible for responding to any requests by a data subject to exercise their rights under the GDPR.

6. Policy Monitoring and Review

- 6.1. The CMAT Board of Trustees will review this policy at least annually. A change to relevant legislation or guidance will trigger an earlier review.
- 6.2. Any changes made to this policy will be communicated to all members of staff.