

# 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 (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 this;
- 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 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 GDPR schools will implement the following Data Protection policies and procedures, and maintain appropriate records as required by these procedures:

### Transparency

1. Privacy notices for pupils and parents (policy and template)
2. Employee data protection policy

### Privacy Rights

3. Rights of the data subject policy
4. Guidance on the rights of the data subject

### Accountability and Records Management

5. Records Management Policy
6. Records Retention Schedule
7. Procedure for keeping records of data processing activities

### Security of Personal Data

8. Security of personal data policy
9. Technical security policy
10. Acceptable usage policy
11. Procedure for the secure transfer of files
12. Bring your own device to work policy
13. Procedure for notification of a personal data breach
14. Data sharing policy and procedure
15. Data Protection Impact assessment policy, procedure and guidance

Each school will nominate an individual of sufficient seniority who will be responsible for ensuring that these policies and procedures are implemented and adhered to. All staff must receive data protection training appropriate to their role. Each school will keep records to demonstrate compliance with these policies and procedures.

Central office staff will, from time to time, conduct audits to ensure compliance.

Version number:	1.0	Target Audience:	All staff
UCST/ULT/Both:	Both	Reason for version change:	GDPR
Date Authorised:		Name of owner/author:	Alison Hussain
Date issued:		Name of individual/department responsible:	Steve Whiffen, Company Secretary
Date Reviewed:			

