

Data Protection Policy (incorporating Information Security)

Signed:	1, 1 AL
Chair of Trust Board:	Claire Delaney
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1. Bellevue Place Education Trust – Our commitment

Learn. Enjoy. Succeed.

Every BPET child and staff member enjoys a broad (LEARN) and enriched (ENJOY) learning experience, enabling them to achieve far greater individual success (SUCCEED) than they might previously have thought possible.

Our Mission

To grow hubs of like-

3 About this policy

3.1 The types of personal data that we may be required to handle include information about pupils, parents, our

- 6.2 Personal Data must also:
 - 6.2.1 be processed in line with data subjects' rights;
 - 6.2.2 not be transferred to people or organisations situated in other countries without adequate protection.
- 6.3 We will comply with these principles in relation to any processing of personal data by BPET.
- 7 Fair and lawful processing

7.1

- 7.5 When special category personal data is being processed then an additional legal ground must apply to that processing. We will normally only process special category personal data under following legal grounds:
 - 7.5.1 where the processing is necessary for employment law purposes, for example in relation to sickness absence;
 - 7.5.2 where the processing is necessary for reasons of substantial public interest, for example for the purposes of equality of opportunity and treatment;
 - 7.5.3 where the processing is necessary for health or social care purposes, for example in relation to pupils with medical conditions or disabilities; and
 - 7.5.4 where none of the above apply then we will seek the consent of the data subject to the processing of their special category personal data.

7.6

- 7.14 Any consent must be freely given, which means that we cannot make the provision of any goods or services or other matter conditional on a data subject giving their consent.
- 7.15 Consent may need to be refreshed where we may need to process the Personal Data for a different and incompatible purpose which was not disclosed when the consent was first considered by the Data Subject.
- 7.16 The DPO must always be consulted in relation to any consent form before consent is obtained.

7.17

10 Adequate, relevant and non-excessive processing

We will only collect personal data to the extent that it is required for the specific purpose notified to the data subject, unless otherwise permitted by Data Protection Legislation.

- 11 Accurate data
- 11.1 We will ensure that personal data we hold is accurate and kept up to date.
- 11.2 We will take reasonable steps to destroy or amend inaccurate or out-of-date data.
- 11.3 Data subjects have a right to have any inaccurate personal data rectified. See further below in relation to the exercise of this right.
- 12 Timely processing
- 12.1 We will not keep personal data longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all personal data which is no longer required.
- 12.2 We will maintain retention policies and procedures to ensure Personal Data is deleted after an appropriate time, unless a law requires that the data is to be kept for a minimum time.
- 12.3 We shall seek to comply with the rights exercised by data subjects as set out in section 12 below as soon as possible and within legal time limits. However, there may be instances where due to circumstances outside of the BPET's control this may not be possible e.g. where the schools have been closed or is only partially operable. In such circumstances data subjects till be notified and provided details about the reason for the delay and when a response can reasonably be expected.
- 13 Processing in line with data subjects' rights
- 13.1 We will process all personal data in line with data subjects' rights, in particular their right to:
 - 13.1.1 request access to any personal data we hold about them;
 - 13.1.2 object to the processing of their personal data, including the right to object to direct marketing;
 - 13.1.3 have inaccurate or incomplete personal data about them rectified;
 - 13.1.4 restrict processing of their personal data;
 - 13.1.5 have personal data we hold about them erased
 - 13.1.6 have their personal data transferred; and
 - 13.1.7 object to the making of decisions about them by automated means.

The Right of Access to Personal Data

13.2 Data subjects may request access to all personal data

The Right to Object

13.3 In certain circumstances data subjects may object to us processing their personal data. This right may be exercised in relation to processing that we are undertaking on the basis of a legitimate interest or in pursuit of a

The Right to Be Forgotten

- 13.15 Data subjects have a right to have personal data about them held by BPET erased only in the following circumstances:
 - 13.15.1 Where the personal data is no longer necessary for the purpose for which it was originally collected;
 - 13.15.2 When a data subject withdraws consent which will apply only where BPET is relying on the individuals consent to the processing in the first place;
 - 13.15.3 When a data subject objects to the processing and there is no overriding legitimate interest to continue that processing –

- 14.3.1 Entry controls. Any stranger seen in entry-controlled areas should be reported to a member of the Senior Leadership Team immediately.
- 14.3.2 Secure lockable desks and cupboards. Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal information is always considered confidential.)
- 14.3.3 Methods of disposal. Paper documents should be shredded. Digital storage devices should be physically destroyed when they are no longer required. IT assets must be disposed of in accordance with the Information Commissioner's Office guidance on the disposal of IT assets.
- 14.3.4 Equipment. Data users must ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended.
- 14.3.5 Working away from the school premises paper documents: staff should ensure that these are always kept upon their person securely and not left unattended.
- 14.3.6 Working away from the school premises electronic working: staff should ensure that they do not leave their devices left unattended and/or unlocked when not in use.
- 14.3.7 Document printing Documents containing personal data must be collected immediately from printers and not left on photocopiers.]
- 14.4 Any member of staff found to be in breach of the above security measures may be subject to disciplinary action.
- 15 Data Protection Impact Assessments
- 15.1 BPET takes data protection very seriously and will consider and comply with the requirements of Data Protection Legislation in relation to all of its activities whenever these involve the use of personal data, in accordance with the principles of data protection by design and default.
- 15.2 In certain circumstances the law requires us to carry out detailed assessments of proposed processing. This includes where we intend to use new technologies which might pose a high risk to the rights of data subjects because of the types of data we will be processing or the way that we intend to do so.
- 15.3 BPET will complete an assessment of any such proposed processing and has a template document which ensures that all relevant matters are considered.
- 15.4 The DPO should always be consulted as to whether a data protection impact assessment is required, and if so how to undertake that assessment.
- 16 Disclosure and sharing of personal information
- 16.1 We may share personal data that we hold about data subjects, and without their consent, with other organisations. Such organisations include the Department for Education, Education and Skills Funding Agency "ESFA", Ofsted, health authorities and professionals, the Local Authority, examination bodies, other schools, and other organisations where we have a lawful basis for doing so.
- 16.2 BPET schools will inform data subjects of any T t(n)3(and)5(def)11(au)4(lt)11(.)] TJETq0.00000912 0 612 792 reW hP893

16.4 Further detail is provided in our Schedule of Processing Activities.

17 Data Processors

- 17.1 We contract with various organisations who provide services to BPET school, including, but not limited to our Payroll provider, School Meal provider, IT managed service provider and MIS system provider.
- 17.2 In order that these services can be provided effectively we are required to transfer personal data of data subjects to these data processors.
- 17.3 Personal data will only be transferred to a data processor if they agree to comply with our procedures and policies in relation to data security, or if they put in place adequate measures themselves to the satisfaction of BPET. The BPET schools will always undertake due diligence of any data processor before transferring the personal data of data subjects to them.
- 17.4 Contracts with data processors will comply with Data Protection Legislation and contain explicit obligations on the data processor to ensure compliance with the Data Protection Legislation, and compliance with the rights of Data Subjects.
- 18 Images and Videos
- 18.1 Parents and others attending school events are allowed to take photographs and videos of those events for domestic purposes. For example, parents can take video recordings of a school performance involving their child. The Trust does not prohibit this as a matter of policy.
- 18.2 BPET schools do not however agree to any such photographs or videos being used for any other purpose, but acknowledges that such matters are, for the most part, outside of the ability of the Trust to prevent.
- 18.3 BPET schools asks that parents and others do not post any images or videos which include any child other than their own child on any social media or otherwise publish those images or videos.
- 18.4 As a BPET school, we want to celebrate the achievements of our pupils and therefore may want to use images and videos of our pupils within promotional materials, or for publication in the media such as local, or even national, newspapers covering school events or achievements. We will seek the consent of pupils, and their parents where appropriate, before allowing the use of images or videos of pupils for such purposes. Appendix A contains a form for parents to give permission for images and videos of the child/ren to be published (through Arbor).
- 18.5 Whenever a pupil begins their attendance at a BPET school they, or their parent where appropriate, will be asked to complete a consent form in relation to the use of images and videos of that pupil. We will not use images or videos of pupils for any purpose where we do not have consent.
- 19 Video surveillance

BPET schools operates a CCTV system. Please refer to the BPET CCTV Policy.

20 Changes to this policy

We may change this policy at any time. Where appropriate, we will notify data subjects of those changes.

Consent form for use of images (photographs, videos, and digital images)

All schools in the Bellevue Place Education Trust use images of pupils for two main reasons: as a learning tool for the pupils, and for publicity purposes.

Images can be displayed on the BPET and the school's websites, social media, in (e)newsletters and printed publications, on the school's learning platforms and in physical displays.

To comply with the General Data Protection Regulations (GDPR) we need your consent to take images of your child and use them in the ways described. Please tick either 'Yes' or 'No' for each box.

I give permission for my child's image / video to be used on the school's website and the BPET Trust website	Yes	No
I give permission for my child's image / video to be used on the school's social media accounts and the BPET trust social media accounts (Facebook, Twitter, Instagram, or any future accounts)	Yes	No
I give permission for my child's image / video to be used on marketing materials by the school and the BPET Trust. These can include: brochures, prospectuses, banners, newsletters, presentations, gifs	Yes	No
I give permission for my child's image / video to be used in local and national newspapers, in print and online	Yes	No
I give permission for my child's image / video to be used within the school, which might be seen by visitors	Yes	No

I give permission for my child's image / video to be used on the school's

Be aware that photographs and videos used for publicity purposes may continue to remain in circulation after your child has left the school. Where any organisations, other than those above, intend to use images of your child, additional consent will be sought before any image is used.

This consent is valid from the date of signing until your child leaves our schools.

You can withdraw your consent at any time by logging into your Parent account in Arbor and revoke the consent. It may not be possible, however, to remove images that are already in the public domain.

ANNEX

DEFINITIONS

Term	Definition
Data	is information which is stored electronically, on a computer, or in certain paper-based filing systems
Data Subjects	for the purpose of this policy include all living individuals about whom we hold personal data. This includes pupils, our workforce, staff, and other individuals. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information