



Bronte Academy Trust

Data Protection Policy

Reviewed By	Approved By	Date of Approval	Version Approved	Next Review Date

1. Policy Statement

Bronte Academy Trust is committed to the eight principles of the Data Protection Act 1998 (The Act):

- Personal data shall be processed fairly and lawfully
- Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes
- Personal data shall be adequate, relevant and not excessive Personal data shall be accurate and, where necessary, kept up to date
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes
- Personal data shall be processed in accordance with the rights of data subjects under The Act
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data
- Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

2. Our Commitment

This statement represents the response of the Bronte Academy Trust Board to its duties under The Act.

Aims

Bronte Academy Trust will implement The Act and the Data Retention Regulations 2009 (The Regulations) and any subsequent amendments or regulations on protecting procedures will ensure integrity and security of data.

Bronte Academy Trust will maintain a Data Protection register entry with the Information Commissioner, and ensure that all personal data obtained, held, used or disclosed conforms to the details recorded within that registration.

In addition, Bronte Academy Trust will ensure that:

- The Trust's Chief Executive Officer has overall responsibility for the implementation of Data Protection arrangements.
- All staff are aware of their responsibilities under The Act.
- All staff are aware of their responsibilities under The Regulations.
- Staff are trained and supported to deal effectively with the requirements of The Act, including the need to deal with subject access requests, in whole or in part, in accordance with the Act.

- The requirements of the Act are considered in decision making processes, such as the development of policy and procedures and the design and the implementation of information systems.
- The operations of the organisation are developed to meet the highest standards of openness and accountability.

3. *Scope of the Policy*

The policy statement of commitment and the ensuing controls and procedures arising from the policy are applicable to all employees of the Trust, including pupils, Governors and Trustees. Those with responsibility for handling or processing information are particularly affected.

4. *Monitoring*

The Trust's Chief Executive Officer will maintain a register of all requests made for information under The Act that do not fall within the remit of the Data Protection Registration with the Information Commissioner, and the action taken on each application. It will identify reoccurring requests for the same or similar information and provide information for the reviews of the Data Protection Registration.

Bronte Academy Trust will register all complaints received about its Data Protection arrangements and will ensure learning points that arise from such complaints are used to improve related policies, procedures and guidance.

The Chief Executive Officer will biannually review this policy and its associated procedures and arrangements to ensure it remains up to date, is effective and takes account of emerging good practice. Where new legal directions come into force, the policy will be reviewed in line with the commencement of that legislation.

The Chief Finance Officer of the Trust will ensure that the Trust's Data Protection Registration is renewed, reviewed and, where necessary, updated annually.

5. *Criteria for monitoring*

The Policy and associated procedures and arrangements will be monitored within the context of legislation, including:

Data Protection
 Data Retention
 Computer Misuse
 Human Rights
 Equal Opportunities
 Telecommunications
 Health & Safety

6. Requests and charges

Requests should be made in writing by letter or by e-mail to the member school or Trust, either to a named member of staff or role title, or to;

The Chief Executive Officer,
Bronte Academy Trust
c/o Lees Primary School
Haworth Road
Cross Roads
Keighley
BD22 9DL.

Proof of identity (normally a driving licence, passport or utility bill or corporate identification in the case of organisations) will be required before the request can be met.

The request will be dealt with within the required response time of 40 calendar days, subject to any extensions as stated within The Act.

If the request is too general, the Trust will offer advice and assistance to determine the information required. The Trust does not have the right to ask why information is being sought, but the information can be volunteered to assist the Trust in meeting the request.

The Trust will provide specific charges for the copying of information dependent on the amount of information required.

7. Review and appeal

If an applicant is dissatisfied with the handling of a request, they have the right to ask for an internal review. Internal review requests should be submitted no later than 40 working days after the date on which the applicant believes that the Trust has failed to comply with the requirement, and should be addressed to:

The Chair of Trust Board
Bronte Academy Trust
c/o Lees Primary School
Haworth Road
Cross Roads
Keighley
BD22 9DL.

If not content with the outcome of the internal review, an applicant has the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

This policy will be reviewed every two years or earlier, if necessary.

Declaration of Responsibility

This Data Protection Policy was reviewed and formally adopted by Bronte Academy Trust on

.....5 April 2017..... Date

..... Signed Chair of Trustees


..... Signed Chief Executive Officer

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