



Keskowethyans
Multi Academy Trust

Date Reviewed by the Committee	
Date Adopted by The Board	
To be reviewed next	
Signed by Chair	

General Data Protection Regulations (GDPR)

Date policy sent to	Date
Secretaries	
Lead Teachers	
Chairs of LGBs	
GS for Website	
Relevant other ie Safeguarding Director/Subject Co-ordinator	

The Keskowethyans MAT is committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller and the handling of such data in line with the data protection principles and the Data Protection Act (DPA).

<https://ico.org.uk/for-organisations/guide-to-data-protection/data-protectionprinciples/>

Changes to data protection legislation (GDPR May 2018) will be monitored and implemented in order to remain compliant with all requirements.

The legal bases for processing data are as follows –

- (a) **Consent:** the member of staff/pupil/parent has given clear consent for the MAT to process their personal data for a specific purpose.
- (b) **Contract:** the processing is necessary for the member of staff's employment Contract.
- (c) **Legal obligation:** the processing is necessary for the MAT to comply with the law (not including contractual obligations)

The member of staff responsible for data protection is **Mrs Sarah Lyne (DPO)**. However all staff must treat all student information in a confidential manner and follow the guidelines as set out in this document.

The MAT is also committed to ensuring that staff are aware of data protection policies and their legal requirements.

The requirements of this policy are mandatory for all staff employed by the MAT and any third party contracted to provide services within the MAT.

Notification:

Our data processing activities are registered with the Information Commissioner's Office (ICO) as required of a recognised Data Controller. Details are available from the ICO:

<https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

Changes to the type of data processing activities being undertaken will be notified to the ICO and details amended in the register.

Breaches of personal or sensitive data need to be notified to the ICO within 72 hours (including weekends and holidays) of the breach. It is therefore imperative that details of the breach are forwarded to the DPO immediately. For example a breach that occurs on a Friday has to be notified before Monday.

Personal and Sensitive Data:

All data within the MAT's control will be identified as personal, sensitive or both, to ensure that it is handled in compliance with legal requirements and access to it does not breach the rights of the individuals to whom it relates.

The definitions of personal and sensitive data will be as those published by the ICO for guidance:

<https://ico.org.uk/for-organisations/guide-to-data-protection/keydefinitions/>

The principles of the Data Protection Act as applied will ensure that all data processed:

- is fairly and lawfully processed
- is only for limited purposes

- is adequate, relevant and not excessive
- is accurate
- is not keep data longer than is necessary
- is in accordance with the data subject's rights
- is secure
- is not transferred to other countries without adequate protection.

Privacy Notice:

We will be transparent about the intended processing of data and communicate these intentions via notification to staff, parents and pupils prior to processing using the appropriate Privacy Notice (Appendix i).

Notifications will be in accordance with ICO guidance: <https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-notice-transparency-and-control/>

There may be circumstances where the MAT is required either by law or in the best interests of our pupils or staff to pass information onto external authorities, for example the Local Authority, Ofsted, or the Department of Health. These authorities are up to date with data protection law and have their own policies relating to the protection of any data that they receive or collect.

The intention to share data to an organisation outside of our MAT is clearly defined in our Privacy Notices, and details of the bases for sharing given. Data will only be shared with external parties in circumstances where it is a legal requirement to provide such information.

Any proposed change to the processing of individual's data will be notified to them.

Under no circumstances will the MAT disclose information or data:

- that would cause serious harm to the pupil or anyone else's physical or mental health or condition
- indicating that the pupil is or has been subject to child abuse or may be at risk of it, where the disclosure would not be in the best interests of the child
- recorded by the pupil in an examination
- that would allow another person to be identified, or identifies another person as the source, unless the person is an employee of the MAT or the Local Authority, or has given consent, or it is reasonable in the circumstances to disclose the information without consent. The exemption from disclosure does not apply if the information can be edited so that the person's name or identifying details are removed
- in the form of a reference given to another school or any other place of education and training, or any national body concerned with student admissions.

Data Security:

In order to assure the protection of all data being processed and inform decisions on processing activities, we will undertake an assessment of the associated risks of proposed processing and equally the impact on an individual's privacy in holding data related to them.

Risk and impact assessments will be conducted in accordance with guidance given by the ICO:

<https://ico.org.uk/for-organisations/guide-to-data-protection/principle-7-security/>
<https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2014/02/privacy-impact-assessments-code-published/>

Security of data will be achieved through the implementation of proportionate physical and technical measures. The DPO will be responsible for the effectiveness of the controls implemented and the reporting of their performance.

The security arrangements of any organisation with which data is shared will also be considered, and where required, these organisations will provide evidence of the competence in the security of shared data.

Data Access Requests (Subject Access Requests):

All individuals whose data is held by us, have a legal right to request access to such data, or information about what is held. We will respond to such requests within 40 days. All requests must be made in writing, and to assist a SAR Application Form is available to download from the Keskowethyans website.

All written requests should be directed to:

Mrs Sarah Lyne
Business Manager
Keskwothyans MAT
St Keverne Primary School
St Keverne,
Helston.
TR12 6NQ

Personal data about pupils will not be disclosed to third parties without the consent of the child's parent or carer, unless it is obliged by law or in the best interest of the child. Data may be disclosed to the following third parties without consent:

- **Other schools**

If a pupil transfers from the Keskowethyans MAT to another school, their academic records and other data relating to their health and welfare will be forwarded to the new school. This will support a smooth transition from one school to the next and ensure that the child is provided for as necessary.

- **Examination authorities**

For registration purposes, to allow the pupils at our MAT to sit examinations set by external exam bodies.

- **Health authorities**

Under health legislation, the MAT may pass on information regarding the health of pupils to monitor and avoid the spread of contagious diseases in the interest of public health.

- **Police and courts**

If a situation arises where a criminal investigation is being carried out we may have to forward information on to the police to aid their investigation. We will pass information onto courts, as and when it is ordered.

- **Social workers and support agencies**

In order to protect or maintain the welfare of our pupils, and in cases of child abuse, it may be necessary to pass personal data on to social workers or support agencies.

- **Educational division**

Schools may be required to pass data on in order to help the government to monitor the national educational system and enforce laws relating to education.

- **Right to be Forgotten**

Where any personal data is no longer required for its original purpose, an individual can demand that the processing is stopped and all their personal data is erased by the MAT including any data held by contracted processors.

Photographs and Video:

Images of staff and pupils may be captured at appropriate times and as part of educational activities for use in our MAT schools only.

Unless prior consent from parents/pupils/staff has been given, the MAT will not utilise such images for publication or communication to external sources.

Location of information and data:

Hard copy data, records, and personal information are stored out of sight and in a locked cupboard. The only exception to this is medical information that may require immediate access during the school day. This will be stored in a secure but accessible manner.

Sensitive or personal information and data should not be removed from the school site, however the MAT acknowledges that some staff may need to transport data between their school and their home in order to access it for work in the evenings and at weekends. This may also apply in cases where staff have offsite meetings, or are on school visits with pupils.

The following guidelines are in place for staff in order to reduce the risk of personal data being compromised:

- Paper copies of data or personal information should not be taken off the school site. If these are misplaced they are easily accessed. If there is no way to avoid taking a paper copy of data off the school site, the information should not be on view in public places, or left unattended under any circumstances.
- Unwanted paper copies of data, sensitive information or pupil files should be shredded. This also applies to handwritten notes if the notes reference any other staff member or pupil by name.
- Care must be taken to ensure that printouts of any personal or sensitive information are not left in printer trays or photocopiers.
- If information is being viewed on a PC, staff must ensure that the window and documents are properly shut down before leaving the computer unattended. Sensitive information should not be viewed on public computers.
- If it is necessary to transport data away from the school, it should be downloaded onto a USB stick. The data should not be transferred from this stick onto any home or public computers. Work should be edited from the USB, and saved onto the USB only.
- USB sticks that staff use must be password protected.

These guidelines are clearly communicated to all school staff, and any person who is found to be intentionally breaching this conduct will be disciplined in line with the seriousness of their misconduct.

Data Disposal:

The MAT recognises that the secure disposal of redundant data is an integral element to compliance with legal requirements and an area of increased risk.

All data held in any form of media (paper, tape, electronic) shall only be passed to a disposal partner with demonstrable competence in providing secure disposal services.

All data shall be destroyed or eradicated to agreed levels meeting recognised national standards, with confirmation at completion of the disposal process.

Disposal of IT assets holding data shall be in compliance with ICO guidance:

https://ico.org.uk/media/fororganisations/documents/1570/it_asset_disposal_for_organisations.pdf

The MAT has identified a qualified source for disposal of IT assets and collections and uses ICT4.

The MAT also uses Britannia shredding services to dispose of sensitive data that is no longer required.

(How we use pupil information)

This policy is to let you know how Keskowethyans Multi Academy Trust will collect, use and process personal data. It is also designed to let you know your rights and what you can do if you have questions about personal data.

The School is the controller for the purposes of Data Protection laws.

This document sets out the types of personal data (meaning information about an individual from which that individual can be personally identified) we handle, the purposes of handling those personal data and any recipients of it.

OUR DETAILS

We are: Keskowethyans Multi Academy Trust

Registered Company Number: 8872161

Address: St. Keverne Primary School, School Hill, St. Keverne, Helston. TR12 6NQ

Information Commissioner's Office Registration Number: ZA147034

Our Data Protection Officer is: Mrs. Sarah Lyne

and their contact details are: St. Keverne Primary School, School Hill, St. Keverne, Helston. TR12 6NQ
bm@kmat.academy
01326 280529

WHY WE COLLECT DATA

We collect and hold personal information relating to our pupils and may also receive information about them from their previous schools, the Local Authority, Department for Education (DfE) and other bodies linked to their education, development and welfare. We may also share personal data with other agencies as necessary under our legal duties or otherwise in accordance with our duties/obligations as a school.

Whilst the majority of pupil information we are provided with or collect is mandatory, some of it is provided to us on a voluntary basis. We will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

Below are set out the reasons why we collect and process personal data, as well as the legal basis on which we carry out this processing:

- **to support our pupils' learning:** we will process personal data to help every child achieve his or her potential in all areas of learning and to promote excellence in our teaching and learning environment.
- **monitor and report on their progress:** we will process personal data to record pupils' progress to help set and monitor targets and boost achievements and aspirations of all pupils.
- **provide appropriate pastoral care:** we will process personal data to ensure that all pupils are properly supported in their time with us. We will process data to help staff understand and respond to the unique circumstances of all pupils.
- **assess the quality of our services:** we will process personal data so that we may reflect on our own practices to help us improve and provide the highest quality education that we can to all pupils.
- **to ensure proper management of school trips and afterschool clubs and activities:** when pupils and parents participate in school trips and afterschool clubs and activities personal data will need to be processed.

- **to promote and protect health and safety:** in order to protect pupils, parents and staff in their involvement at the school, we must process personal data relating to matters such as incidents and responses to incidents.

LEGAL BASIS FOR PROCESSING

The lawful basis for us to collect/process this personal data is in order to provide education in accordance with statute law (such as the Education Act 1996 and other legislation), our funding agreements with the Secretary of State, our Memorandum and Articles of Association and other guidance provided for in law.

In addition, personal data will be collected and/or processed for the purposes of relevant contracts for the provision of services which are paid for. This may include but is not limited to:

- The provision of music tuition;
- School trips;
- The provision of swimming sessions
- The provision of sailing sessions

We do not process any special categories of personal data except where necessary for reasons of substantial public interest in complying with legal obligations including under the Equality Act 2010 or where necessary to protect the vital interests of the data subject or of another natural person and where safeguards are in place to ensure that this personal data is kept secure. For the avoidance of doubt where special categories of personal data are collected it shall not be used for the purposes of automated decision making and/or profiling.

Special categories of data means personal data revealing:

- racial or ethnic origin
- religious or philosophical beliefs, genetic or biometric data
- health data
- data relating to criminal convictions or offences or related security measures.
- Further personal data including special categories of personal data may be collected and/or processed where consent has been given (for example, school photographs for non-educational purposes). If consent has been given then this may be revoked in which case the personal data will no longer be collected/processed.

CATEGORIES OF INFORMATION WE COLLECT

We may collect the following types of personal data (please note this list does not include every type of personal data and may be updated from time to time):

- contact details;
- data of birth;
- health and/or other medical information;

- information in connection with education (included but not limited to unique pupil numbers, test results, and other records);
- attendance information;
- behavioural and disciplinary information;
- free school meal eligibility;
- information received in connection with any complaint;
- information required for employment purposes, such as:
 - national Insurance numbers;
 - remuneration details;
 - qualifications;
- personal characteristics of pupils, such as:
 - their nationality and ethnic group;
 - their religion;
 - their first-language;
 - any special educational needs they may have;
 - any relevant protected characteristics.

WHO WILL HAVE ACCESS TO YOUR DATA

Personal data will be accessible by members of staff. Where necessary, Volunteers and Directors will also have access to personal data.

We will not share information about our pupils with third parties without consent unless we are required to do so by law or our policies. We will disclose personal data to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation; for example, we share pupils' personal data with the Department for Education on a statutory basis;
- in order to enforce any agreements with you;
- to protect the rights, property, or safety of the school, other pupils or others. This includes exchanging information with other organisations for the purposes of child welfare.

This may include our Local Authority, the Department for Education, the Police and other organisations where necessary; for example, for the purposes of organising a school trip or otherwise enabling students to access services, or for the purposes of examination entry. Information may also be sent to other schools where necessary; for example, schools that pupils attend after leaving us.

HOW DATA WILL BE PROCESSED

Personal data may be processed in a variety of ways; this will include but is not limited to:

- sending by e-mail (encrypted where possible);
- adding to spreadsheets, word documents or similar for the purposes of assessing personal data;
- for educational software use (this could be for the purposes of helping children learn, discipline, reports and other educational purposes).

WHERE WE STORE DATA AND HOW WE KEEP DATA SECURE

Paper copies of personal data are kept securely at the school; for example, in secure filing cabinets.

Electronic copies of personal data are kept securely and information will only be processed where we are satisfied that it is reasonably secure.

All information you provide to us is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. You must not share your password with anyone.

When giving personal data to third parties (for example, software providers) it is possible that this personal data could be stored in a location outside of the European Economic Area. We will take all steps reasonably necessary to ensure that personal data is treated securely and in accordance with this privacy policy. In particular, any transfer of personal data made by us to a location outside of the EEA will be governed by clauses in a written contract in order to keep these secure.

RETENTION PERIODS

We will only retain personal data for as long as is necessary to achieve the purposes for which it was originally collected. As a general rule, personal data will be kept for the entire period that a child is a pupil at the school. Other records (for example, safeguarding or in relation to special educational needs) will be kept for longer in accordance with guidance from the Local Authority. Further information on retention periods can be obtained by contacting us via the details on Page 1 of this Notice.

YOUR DATA RIGHTS

The General Data Protection Regulation and associated law gives you rights in relation to personal data held about you and your child. These are:

- **Right of Access:** if your personal data is held by the School, you are entitled to access your personal data (unless an exception applies) by submitting a written request. We will aim to respond to that request within

one month. If responding to your request will take longer than a month, or we consider that an exception applies, then we will let you know.

- **Right of Rectification:** you have the right to require us to rectify any inaccurate personal data we hold about you. You also have the right to have incomplete personal data we hold about you completed. If you have any concerns about the accuracy of personal data that we hold then please contact us.
- **Right to Restriction:** you have the right to restrict the manner in which we can process personal data where:
 - the accuracy of the personal data is being contested by you;

- the processing of personal data is unlawful, but you do not want the relevant personal data to be erased; or
- we no longer need to process your personal data for the agreed purposes, but you want to preserve your personal data for the establishment, exercise or defence of legal claims.

Where any exercise by you of your right to restriction determines that our processing of particular personal data are to be restricted, we will then only process the relevant personal data in accordance with your consent and, in addition, for storage purposes and for the purpose of legal claims.

- **Right to Erasure:** You have the right to require we erase your personal data which we are processing where one of the following grounds applies:
 - the processing is no longer necessary in relation to the purposes for which your personal data were collected or otherwise processed;
 - our processing of your personal data is based on your consent, you have subsequently withdrawn that consent and there is no other legal ground we can use to process your personal data;
 - the personal data have been unlawfully processed; and
 - the erasure is required for compliance with a law to which we are subject.
- **Right to Data Portability:** you have the right to receive your personal data in a format that can be transferred. We will normally supply personal data in the form of e-mails or other mainstream software files. If you want to receive your personal data which you have provided to us in a structured, commonly used and machine-readable format, please contact us via the details in Section 1 of this Notice.

You can find out more about the way these rights work from the website of the Information Commissioner's Office (ICO).

REQUESTING YOUR DATA

Where the School holds personal data concerning you, you are entitled to access that personal data and the following information (unless an exception applies):

- a copy of the personal data we hold concerning you, provided by the School;
- details of why we hold that personal data;
- details of the categories of that personal data;
- details of the envisaged period for which that personal data will be stored, if possible;
- information as to the source of personal data where that personal data was not collected from you personally.

If you want to receive a copy of the information about your son/daughter that we hold, please contact us via the details on Page 1 of this Notice.

MAKING A COMPLAINT

If you are unhappy with the way we have dealt with any of your concerns, you can make a complaint to the ICO, the supervisory authority for data protection issues in England and Wales. We would recommend that you complain to

us in the first instance, but if you wish to contact the ICO you can do so using the details below. The ICO is a wholly independent regulator established in order to enforce data protection law.

ICO Concerns website: www.ico.org.uk/concerns

ICO Helpline: 0303 123 1113

ICO Email: casework@ico.org.uk

ICO Postal Address: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

CHANGES TO THIS NOTICE

Any changes we make to this notice in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes.

This privacy policy was last updated on 30/04/2018

PRIVACY NOTICE - STAFF

(How we use staff information)

This policy is to let you know how Keskowethyans MAT will collect, use and process personal data. It is also designed to let you know your rights and what you can do if you have questions about personal data.

The School is the controller for the purposes of data protection laws.

This document sets out the types of personal data (meaning information about an individual from which that individual can be personally identified) we handle, the purposes of handling those personal data and any recipients of it.

OUR DETAILS

We are: Keskowethyans Multi Academy Trust

Registered Company Number: 8872161

Address: St Keverne Primary School, School Hill, St Keverne, Helston. TR12 6NQ

Information Commissioner's Office Registration Number: ZA147034

Our Data Protection Officer is: Mrs Sarah Lyne

and their contact details are: St Keverne Primary School, School Hill, St Keverne, Helston. TR12 6NQ
bm@kmat.academy
01326 280539

WHY WE COLLECT DATA

We collect and hold personal information relating to the MAT workforce and may also receive information about them from previous employers, the Local Authority, Department for Education (DfE) and other professional bodies. We may also share personal data with other agencies as necessary under our legal duties or otherwise in accordance with our duties/obligations as a MAT.

Whilst the majority of workforce information we are provided with or collect is mandatory, some of it is provided to us on a voluntary basis. We will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

Below are set out the reasons why we collect and process personal data, as well as the legal basis on which we carry out this processing:

We use workforce data to:

- Enable the development of a comprehensive picture of the workforce and how it is deployed
- Inform the development of recruitment and retention policies
- Enable individuals to be paid

LEGAL BASIS FOR PROCESSING

The lawful basis for us to collect/process this personal data is in order to provide education in accordance with statute law (such as the Education Act 1996 and other legislation), our funding agreements with the Secretary of State, our memorandum and articles of association and other guidance provided for in law.

In addition, personal data will be collected and/or processed for the purposes of relevant contracts for the provision of services which are paid for.

We do not process any special categories of personal data except where necessary for reasons of substantial public interest in complying with legal obligations including under the Equality Act 2010 or where necessary to protect the vital interests of the data subject or of another natural person and where safeguards are in place to ensure that this personal data is kept secure. For the avoidance of doubt where special categories of personal data are collected it shall not be used for the purposes of automated decision making and/or profiling.

Special categories of data means personal data revealing:

- racial or ethnic origin;
- political opinions; religious or philosophical beliefs or trade union membership;
- genetic or biometric data that uniquely identifies you;
- data concerning your health, sex life or sexual orientation; or
- data relating to criminal convictions or offences or related security measures.

- Further personal data including special categories of personal data may be collected and/or processed where consent has been given (for example, school photographs for non-educational purposes). If consent has been given then this may be revoked in which case the personal data will no longer be collected/processed.

CATEGORIES OF INFORMATION WE COLLECT

We may collect the following types of personal data (please note this list does not include every type of personal data and may be updated from time to time):

- contact details;
- date of birth;
- health and/or other medical information (including confirmation of fit to work);
- information in connection with education (including academic and other qualifications);
- attendance information;
- behavioural and disciplinary information;
- information received in connection with any complaint;
- information required for employment purposes, such as:
 - ❖ national Insurance numbers;
 - ❖ bank details
 - ❖ remuneration details;

WHO WILL HAVE ACCESS TO YOUR DATA

Personal data will be accessible only by specific members of staff, in order to fulfil their contractual role. Where necessary Directors/Governors will also have access to personal data.

We will not share information about our workforce with third parties without consent unless we are required to do so by law or our policies. We will take all steps reasonably necessary to ensure that once your personal data is shared it is treated securely and in accordance with this privacy policy. We will disclose personal data to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal or contractual obligation; for example, we share bank details with County Payroll
- in order to enforce any agreements with you;
- to protect the rights, property, or safety of the MAT and its pupils. This includes exchanging information with other organisations for the purposes of child welfare.

This may include our Local Authority, the Department for Education, the Police and other organisations where necessary.

HOW DATA WILL BE PROCESSED

Personal data may be processed in a variety of ways; this will include but is not limited to:

- sending by e-mail (encrypted where possible);
- adding to spreadsheets, word documents or similar for the purposes of assessing personal data;
- for educational software use (this could be for the purposes of helping children learn, discipline, reports and other educational purposes).

WHERE WE STORE DATA AND HOW WE KEEP DATA SECURE

Paper copies of personal data are kept securely at St Keverne Primary School in a secure filing cabinets

Electronic copies of personal data are kept securely and information will only be processed where we are satisfied that it is reasonably secure.

All information you provide to us is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. You must not share your password with anyone.

When giving personal data to third parties (for example, software providers) it is possible that this personal data could be stored in a location outside of the European Economic Area. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy policy. In particular, any transfer of your personal data made by us to a location outside of the EEA will be governed by clauses in a written contract in order to keep these secure.

RETENTION PERIODS

We will only retain personal data for as long as is necessary to achieve the purposes for which they were originally collected. As a general rule, personal data will be kept for the entire period that a member of staff is employed at the MAT, and for six years following the termination of their contract. Other records (for example, safeguarding or in relation to special educational needs) will be kept for longer in accordance with guidance from the Local Authority. Further information on retention periods can be obtained by contacting us via the details in Section 1 of this Notice.

YOUR DATA RIGHTS

The General Data Protection Regulation and associated law gives you rights in relation to personal data held about you. These are:

- **Right of Access:** if your personal data is held by the MAT, you are entitled to access your personal data (unless an exception applies) by submitting a written request. We will aim respond to that request within one month. If responding to your request will take longer than a month, or we consider that an exception applies, then we will let you know.
- **Right of Rectification:** you have the right to require us to rectify any inaccurate personal data we hold about you. You also have the right to have incomplete personal data we hold about you completed. If you have any concerns about the accuracy of personal data that we hold then please contact us.

- **Right to Restriction:** you have the right to restrict the manner in which we can process personal data where:
 - ❖ the accuracy of the personal data is being contested by you;
 - ❖ the processing of your personal data is unlawful, but you do not want the relevant personal data to be erased; or
 - ❖ we no longer need to process your personal data for the agreed purposes, but you want to preserve your personal data for the establishment, exercise or defence of legal claims.

Where any exercise by you of your right to restriction determines that our processing of particular personal data are to be restricted, we will then only process the relevant personal data in accordance with your consent and, in addition, for storage purposes and for the purpose of legal claims.

- **Right to Erasure:** You have the right to require we erase your personal data which we are processing where one of the following grounds applies:
 - ❖ the processing is no longer necessary in relation to the purposes for which your personal data were collected or otherwise processed;
 - ❖ our processing of your personal data is based on your consent, you have subsequently withdrawn that consent and there is no other legal ground we can use to process your personal data;
 - ❖ the personal data have been unlawfully processed; and
 - ❖ the erasure is required for compliance with a law to which we are subject.
- **Right to Data Portability:** you have the right to receive your personal data in a format that can be transferred. We will normally supply personal data in the form of e-mails or other mainstream software files. If you want to receive your personal data which you have provided to us in a structured, commonly used and machine-readable format, please contact us via the details in Section 1 of this Notice.

You can find out more about the way these rights work from the website of the Information Commissioner's Office (ICO).

REQUESTING YOUR DATA

Where the MAT holds personal data concerning you, you are entitled to access that personal data and the following information (unless an exception applies):

- a copy of the personal data we hold concerning you, provided by the MAT;
- details of why we hold that personal data;
- details of the categories of that personal data;
- details of the envisaged period for which that personal data will be stored, if possible;
- information as to the source of personal data where that personal data was not collected from you personally.

If you want to receive a copy of the information about your son/daughter that we hold, please contact us via the details in Section 1 of this Notice.

MAKING A COMPLAINT

If you are unhappy with the way we have dealt with any of your concerns, you can make a complaint to the ICO, the supervisory authority for data protection issues in England and Wales. We would recommend that you complain to us in the first instance, but if you wish to contact the ICO on the details you can do so on the details below. The ICO is a wholly independent regulator established in order to enforce data protection law.

ICO Concerns website: www.ico.org.uk/concerns

ICO Helpline: 0303 123 1113

ICO Email: casework@ico.org.uk

ICO Postal Address: Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Changes to this notice

Any changes we make to this notice in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes.

This privacy policy was last updated on 30/04/2018

PRIVACY NOTICE – Directors/Partners in Learning

(How we use your information)

This policy is to let you know how Keskowethyans MAT will collect, use and process personal data. It is also designed to let you know your rights and what you can do if you have questions about personal data.

The School is the controller for the purposes of data protection laws.

This document sets out the types of personal data (meaning information about an individual from which that individual can be personally identified) we handle, the purposes of handling those personal data and any recipients of it.

OUR DETAILS

We are: Keskowethyans Multi Academy Trust

Registered Company Number: 8872161

Address: St Keverne Primary School, School Hill, St Keverne, Helston. TR12 6NQ

Information Commissioner's Office Registration Number: ZA147034

Our Data Protection Officer is: Mrs Sarah Lyne

and their contact details are: St Keverne Primary School, School Hill, St Keverne, Helston. TR12 6NQ
bm@kmat.academy
01326 280539

WHY WE COLLECT DATA

We collect and hold personal information relating to the MAT Directors and Partners in Learning (PILs) and may also receive information about them from other professional bodies. We may also share personal data with other bodies as necessary under our legal duties or otherwise in accordance with our duties/obligations as a MAT.

Whilst the majority of information we are provided with or collect is mandatory, some of it is provided to us on a voluntary basis. We will inform you whether you are required to provide certain information to us or if you have a choice in this.

Below are set out the reasons why we collect and process personal data, as well as the legal basis on which we carry out this processing:

We use this data to:

- Carry out the legal requirements of the Board of Directors
- Carry out the MAT monitoring requirements as specified by DfE

LEGAL BASIS FOR PROCESSING

The lawful basis for us to collect/process this personal data is in order to provide education in accordance with statute law (such as the Education Act 1996 and other legislation), our funding agreements with the Secretary of State, our memorandum and articles of association and other guidance provided for in law.

We do not process any special categories of personal data except where necessary for reasons of substantial public interest in complying with legal obligations including under the Equality Act 2010 or where necessary to protect the vital interests of the data subject or of another natural person and where safeguards are in place to ensure that this personal data is kept secure. For the avoidance of doubt where special categories of personal data are collected it shall not be used for the purposes of automated decision making and/or profiling.

Special categories of data means personal data revealing:

- racial or ethnic origin;

- political opinions; religious or philosophical beliefs or trade union membership;
- data concerning your health, sex life or sexual orientation; or
- data relating to criminal convictions or offences or related security measures.
- Further personal data including special categories of personal data may be collected and/or processed where consent has been given (for example, photographs for non-educational purposes). If consent has been given then this may be revoked in which case the personal data will no longer be collected/processed.

CATEGORIES OF INFORMATION WE COLLECT

We may collect the following types of personal data (please note this list does not include every type of personal data and may be updated from time to time):

- contact details;
- date of birth;
- information in connection with education (including academic and other qualifications);

WHO WILL HAVE ACCESS TO YOUR DATA

Personal data will be accessible only by specific members of staff, in order to fulfil their contractual role.

We will not share information about our Directors or PILs with third parties without consent unless we are required to do so by law or our policies. We will take all steps reasonably necessary to ensure that once your personal data is shared it is treated securely and in accordance with this privacy policy. We will disclose personal data to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation;
- to protect the rights, property, or safety of the MAT and its pupils. This includes exchanging information with other organisations for the purposes of child welfare.

This may include our Local Authority, the Department for Education, the Police and other organisations where necessary.

HOW DATA WILL BE PROCESSED

Personal data may be processed in a variety of ways; this will include but is not limited to:

- sending by e-mail (encrypted where possible);
- adding to spreadsheets, word documents or similar

WHERE WE STORE DATA AND HOW WE KEEP DATA SECURE

Paper copies of personal data are kept securely at St Keverne Primary School in a secure filing cabinets

Electronic copies of personal data are kept securely and information will only be processed where we are satisfied that it is reasonably secure.

All information you provide to us is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. You must not share your password with anyone.

When giving personal data to third parties (for example, software providers) it is possible that this personal data could be stored in a location outside of the European Economic Area. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy policy. In particular, any transfer of your personal data made by us to a location outside of the EEA will be governed by clauses in a written contract in order to keep these secure.

RETENTION PERIODS

We will only retain personal data for as long as is necessary to achieve the purposes for which they were originally collected. As a general rule, personal data will be kept for the entire period that a Director / PIL is associated with the MAT in that capacity. Further information on retention periods can be obtained by contacting us via the details in Section 1 of this Notice.

YOUR DATA RIGHTS

The General Data Protection Regulation and associated law gives you rights in relation to personal data held about you. These are:

- **Right of Access:** if your personal data is held by the MAT, you are entitled to access your personal data (unless an exception applies) by submitting a written request. We will aim to respond to that request within one month. If responding to your request will take longer than a month, or we consider that an exception applies, then we will let you know.
- **Right of Rectification:** you have the right to require us to rectify any inaccurate personal data we hold about you. You also have the right to have incomplete personal data we hold about you completed. If you have any concerns about the accuracy of personal data that we hold then please contact us.
- **Right to Restriction:** you have the right to restrict the manner in which we can process personal data where:
 - ❖ the accuracy of the personal data is being contested by you;
 - ❖ the processing of your personal data is unlawful, but you do not want the relevant personal data to be erased; or
 - ❖ we no longer need to process your personal data for the agreed purposes, but you want to preserve your personal data for the establishment, exercise or defence of legal claims.

Where any exercise by you of your right to restriction determines that our processing of particular personal data are to be restricted, we will then only process the relevant personal data in accordance with your consent and, in addition, for storage purposes and for the purpose of legal claims.

- Right to Erasure: You have the right to require we erase your personal data which we are processing where one of the following grounds applies:
 - ❖ the processing is no longer necessary in relation to the purposes for which your personal data were collected or otherwise processed;
 - ❖ our processing of your personal data is based on your consent, you have subsequently withdrawn that consent and there is no other legal ground we can use to process your personal data;
 - ❖ the personal data have been unlawfully processed; and
 - ❖ the erasure is required for compliance with a law to which we are subject.
- Right to Data Portability: you have the right to receive your personal data in a format that can be transferred. We will normally supply personal data in the form of e-mails or other mainstream software files. If you want to receive your personal data which you have provided to us in a structured, commonly used and machine-readable format, please contact us via the details in Section 1 of this Notice.

You can find out more about the way these rights work from the website of the Information Commissioner's Office (ICO).

REQUESTING YOUR DATA

Where the MAT holds personal data concerning you, you are entitled to access that personal data and the following information (unless an exception applies):

- a copy of the personal data we hold concerning you, provided by the MAT;
- details of why we hold that personal data;
- details of the categories of that personal data;
- details of the envisaged period for which that personal data will be stored, if possible;
- information as to the source of personal data where that personal data was not collected from you personally.

If you want to receive a copy of the information that we hold, please contact us via the details in Section 1 of this Notice.

MAKING A COMPLAINT

If you are unhappy with the way we have dealt with any of your concerns, you can make a complaint to the ICO, the supervisory authority for data protection issues in England and Wales. We would recommend that you complain to us in the first instance, but if you wish to contact the ICO on the details you can do so on the details below. The ICO is a wholly independent regulator established in order to enforce data protection law.

ICO Concerns website: www.ico.org.uk/concerns

ICO Helpline: 0303 123 1113

ICO Email: casework@ico.org.uk

ICO Postal Address: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Changes to this notice

Any changes we make to this notice in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes.

This privacy policy was last updated on 30/04/2018