



## Appropriate Policy Document

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<b>Reviewed by</b>	Operations Director
<b>Approved by</b>	SLT
<b>Date of approval</b>	June 2025
<b>Policy owner</b>	Operations Director
<b>Location</b>	Website

## **1. Description of the Data Processed**

1.1. In accordance with the Trust's legal obligations in relation to safer recruitment, as set out in 'Keeping Children Safe in Education', the Trust has adopted recruitment procedures that help to deter, reject or identify people who might abuse children. To ensure pupils within the Trust are adequately protected and the most suitable candidates are chosen, the Trust processes criminal offence data.

1.2. To comply with child protection and safeguarding laws, the Trust and Academies process criminal offence data for serving staff members, volunteers and successful job applicants to ensure they are and remain suitable to work with and around pupils. We also collect DBS and identification data in relation to contractors and agency staff working on Academy sites.

1.3. We process special category data – this includes information about individuals' health and wellbeing, ethnicity, photographs and, for staff, we may collect information regarding membership of any trade unions.

1.4. Additional information about the data the Trust processes and the way data is processed is available in the relevant privacy notices and data protection policies.

1.5. The personal data of staff members, including DBS and criminal offence data is recorded on each Academy's Single Central Record.

## **2. Conditions for Processing**

2.1. The Trust and Academies process special category and criminal offence data in accordance with Schedule 1 of the DPA 2018.

2.2. To fulfil our statutory duties and legal obligations, the Trust and Academies special category data under the substantial public interest conditions (part 2) of the DPA 2018, which include the following:

- Racial and ethnic diversity at senior levels of organisations
- Preventing or detecting unlawful acts
- Support for individuals with a particular disability or medical condition
- Safeguarding of children and of individuals at risk
- Occupational pensions

## **3. Compliance with the Data Protection Principles**

### **Accountability**

- 3.1. The Trust and Academies ensure compliance with the accountability principle of the UK GDPR and DPA 2018 by implementing a Data Protection Policy which outlines our stance and approach to fulfilling our statutory duties.
- 3.2. A Data Protection Impact Assessment should be prepared in accordance with the Data Protection Policy to support the security of personal data.
- 3.3. The Information Security Policy provides information to ensure that personal data is kept secure in on and offline formats.

### **Lawfulness, fairness and transparency**

- 3.4. Privacy notices are provided to communicate how the Trust and Academies use personal data, and shared with data subjects.
- 3.5. Personal data is not used in a way that is detrimental, unexpected or misleading.
- 3.6. Before collecting data and using personal data, a lawful basis for doing so is identified.

- 3.7. The data we process and collect is used in accordance with our statutory obligations.

### **Purpose limitation**

- 3.8. The Trust and Academies do not collect personal data for purposes that are incompatible with the purposes for which it is collected.
- 3.9. Special category and criminal offence data is only collected to assist the Trust and Academies in fulfilling their legal obligations, in accordance with statutory guidance.
- 3.10. The privacy notices developed by the Trust and Academies clearly outline our purposes for processing data.

### **Data minimisation**

- 3.11. In accordance with the Retention and Records Management Policy, the Trust and Academies do not retain data for longer than it is necessary. The data that is held is reviewed frequently to ensure excess information can be disposed of.
- 3.12. The Trust and Academies only collect the data that it requires to fulfil the relevant purpose.

### **Accuracy**

- 3.13. Individuals are informed of their right to rectify any data the Trust and Academies hold about them that may be incorrect.
- 3.14. In cases where an individual contests the accuracy of the personal data, processing is restricted until the Trust has verified the accuracy of the data.
- 3.15. Appropriate technical and organisational measures are implemented to enable any inaccuracies to be corrected and to minimise the risk of errors.

### **Storage Limitation**

- 3.16. No personal data, including special category data and data relating to criminal offences are kept for longer than it is required. Specific timeframes for retention are set out in the Retention and Records Management Policy.
- 3.17. Individuals are informed of their right to erasure and the Trust and Academies adhere to all requests for data to be erased.
- 3.18. The data held by the Trust and Academies is reviewed regularly and either anonymised or erased when it is no longer needed.

### **Integrity and Confidentiality (Security)**

- 3.19. The Trust and Academies have technical measures in place to ensure confidentiality of data.
- 3.20. The Trust and Academies have security provisions in place which must be reviewed regularly to ensure they are working to the required standard.
- 3.21. Back-up records are kept in the event primary sources of data cannot be accessed.
- 3.22. Risks presented by the Trust's and Academies' processing are analysed to determine the appropriate level of security required for data processing.

## **4. Retention and Erasure**

- 4.1. In accordance with the UK GDPR and DPA 2018, the Trust and Academies implement a Retention and Records Management Policy which outlines the timeframes different types of data are retained for.

- 4.2. Data is not retained for longer than its original purpose, and the Trust and Academies make it clear to individuals, within the privacy notices, that their data can be erased under the rights of data subjects, under certain conditions.

## **5. Policy review**

- 5.1. This policy is reviewed and, where necessary, update annually by the DPO.
- 5.2. All updates are carried out in line with the Trust's data protection obligations. Amendments are communicated to all relevant stakeholders.