Northern Lights
LEARNING TRUST

Data Protection Policy

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Person in charge: COO

Link Director: Chair of Board

Northern Lights Learning Trust

Signed off by: Chair of Board

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Pastoral Care/Spiritual Development

The quality of relationships between all members of school staff and pupils, and the relationship with parents and carers is the area that is most commonly associated with the ethos of the schools in our Trust. It is expressed in the terms of sharing and caring. In the Church schools in our Trust, we follow the teachings of:

‘Love your neighbour as yourself’ – Matthew 22:39.

‘This is my commandment: love each other’ - John 15:17.

In our schools we believe every pupil is an individual who is valued for who they are.

We have a series of overlapping networks of relationships, which includes governors, staff, children, parents, church members, and members of the community which the school seeks to serve. Our pastoral work will strive to meet the significant challenge to create and maintain such networks including in our Church schools in ways which reflect the Gospel. Those who are in leadership roles, which includes all who have a particular responsibility, ensure that by their personal example they set the highest standards expected.

It is from this premise that both Christian and spiritual love will pervade all aspects of life at Northern Lights Learning Trust. It will influence how we reward and teach discipline. It will affect how we value work and the achievements of pupils and staff. It will be seen in the way in which the school environments are created and cared for, in the way in which the needs of pupils, parents, and community are met, and in the way in which teaching and non-teaching staff work together effectively as a team. Pastoral care pervades all aspects of school life and therefore will be reflected in the way the schools are organised and the policies are written and implemented.

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1. Statement of intent

Northern Lights Learning Trust is required to keep and process certain information about its staff members and pupils in accordance with its legal obligations under the General Data Protection Regulation (GDPR).

The trust or its academies may, from time to time, be required to share personal information about its staff or pupils with other organisations, mainly the DfE, LA, other schools and educational bodies, and potentially children's services.

This policy is in place to ensure all staff and governors are aware of their responsibilities and outlines how the school complies with the following core principles of the GDPR.

Organisational methods for keeping data secure are imperative, and Northern Lights Learning Trust believes that it is good practice to keep clear practical policies, backed up by written procedures.

- Legal framework

.1. This policy has due regard to legislation, including, but not limited to the following:

- The General Data Protection Regulation (GDPR) The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020
- The Freedom of Information Act 2000 Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016) The Education (Pupils Information) (England) (Miscellaneous Amendments) Regulations 2016
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998 School Standards and Framework Act 1998
- The Data Protection Act 2018 Data Protection Act 2018 (DPA 2018)
- In addition, this policy complies with regulation 5 of the Education (Pupil Information) (England) Regulations 2005, which gives parents the right of access to their child's educational record.

.2. This policy will also have regard to the following guidance:

- ICO (2018) 'Guide to the General Data Protection Regulation (GDPR)' Guide to GDPR
- DfE (2018) 'Data protection: a toolkit for schools' DfE guidance on Data Protection in Schools

.3. This policy will be implemented in conjunction with the following other school policies:

- Freedom of Information Model scheme
- Individual Academy Social Media Policies
- Internet Policy
- Mobile Telecommunications device policy

- Applicable Data

.1. For the purpose of this policy, personal data refers to information that relates to an identifiable, living individual, including information such as an online identifier, e.g. an IP address. The GDPR applies to both automated personal data and to manual filing systems, where personal data is accessible according to specific criteria, as well as to chronologically ordered data and pseudonymised data, e.g. key-coded.

> Sensitive personal data is referred to in the GDPR as 'special categories of personal data', which are broadly the same as those in the Data Protection Act (DPA) 2018. These specifically include the processing of racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetics, biometrics used for identification purposes, physical or mental health and sex life or sexual orientation.

- Principles

.1. In accordance with the requirements outlined in the GDPR, personal data will be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up-to-date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods, insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

.2. The GDPR also requires that "the controller shall be responsible for, and able to demonstrate, compliance with the principles". The 'data controller' is considered to be a person or organisation that determines the purposes and the means of processing personal data. Northern Lights Learning Trust is the identified data controller.

- Accountability

.1. Northern Lights Learning Trust will implement appropriate technical and organisational measures to demonstrate that data is processed in line with the principles set out in the GDPR.

.2. The trust will provide comprehensive, clear and transparent privacy policies.

.3. Records of activities relating to higher risk processing will be maintained, such as the processing of activities that:

- Are not occasional
- Could result in a risk to the rights and freedoms of individuals

- Involve the processing of special categories of data or criminal convictions and offence data.

.4. Internal records of processing activities will include the following:

- Name and details of the organisation
- Purpose(s) of the processing
- Description of the categories of individuals and personal data
- Retention schedules
- Categories of recipients of personal data
- Description of technical and organisational security measures
- Details of transfers to third countries, including documentation of the transfer mechanism safeguards in place

.5. The trust will implement measures that meet the principles of data protection by design and data protection by default, such as:

- Data minimisation.
- Pseudonymisation.
- Transparency.
- Allowing individuals to monitor processing.
- Continuously creating and improving security features.

.6. Data protection impact assessments will be used, where appropriate.

- Data protection officer (DPO) and Data Protection Lead (DPL)

.1. Our DPO is GDPR Sentry and will:

- Inform and advise the trust, its academies and its employees about their obligations to comply with the GDPR and other data protection laws.
- Monitor the school's compliance with the GDPR and other laws, including managing internal data protection activities, advising on data protection impact assessments, conducting internal audits, and providing the required training to staff members.

.2. The individual appointed as DPO will have professional experience and knowledge of data protection law, particularly that in relation to schools.

.3. An existing employee will be appointed to the role of Data Protection Lead (DPL) provided that their duties are compatible with the duties of the DPL and do not lead to a conflict of interest. The DPL for Northern Lights Learning Trust is the Chief Operating Officer, Lisa Cockburn, who can be contacted via email to: info@nllt.co.uk

.4. The DPL will report to the highest level of management within the schools and the trust, which is the CEO and the Board of Trustees.

- Lawful Processing

.1. The legal basis for processing data will be identified and documented prior to data being processed.

.2. Under the GDPR, data will be lawfully processed under the following conditions:

- The consent of the data subject has been obtained.
- Processing is necessary for:
  - Compliance with a legal obligation.
  - The performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
  - For the performance of a contract with the data subject or to take steps to enter into a contract.
  - Protecting the vital interests of a data subject or another person.
  - For the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject. (This condition is not available to processing undertaken by the school in the performance of its tasks.)

.3. Sensitive data will only be processed under the following conditions:

- Explicit consent of the data subject, unless reliance on consent is prohibited by EU or Member State law.
- Processing carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes) and provided there is no disclosure to a third party without consent.
- Processing relates to personal data manifestly made public by the data subject.
- Processing is necessary for:
  - Carrying out obligations under employment, social security or social protection law, or a collective agreement.
  - Protecting the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent.
  - The establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity.
  - Reasons of substantial public interest on the basis of Union or Member State law which is proportionate to the aim pursued and which contains appropriate safeguards.
  - The purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional.

- Reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of healthcare and of medicinal products or medical devices.
- Archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1).

For criminal offence data, we will meet both a lawful basis and a condition set out under data protection law. Conditions include:

- The individual (or their parent/carer when appropriate in the case of a pupil) has given **consent**
- The data needs to be processed to ensure the **vital interests** of the individual or another person, where the individual is physically or legally incapable of giving consent
- The data has already been made **manifestly public** by the individual
- The data needs to be processed for or in connection with legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of **legal rights**
- The data needs to be processed for reasons of **substantial public interest** as defined in legislation

Whenever we first collect personal data directly from individuals, we will provide them with the relevant information required by data protection law.

We will always consider the fairness of our data processing. We will ensure we do not handle personal data in ways that individuals would not reasonably expect, or use personal data in ways which have unjustified adverse effects on them.

.4. Where the school relies on:

- ‘Performance of contract’ to process a child’s data, the school considers the child’s competence to understand what they are agreeing to, and to enter into a contract.
- ‘Legitimate interests’ to process a child’s data, the school takes responsibility for identifying the risks and consequences of the processing, and puts age-appropriate safeguards in place.
- Consent to process a child’s data, the school ensures that the requirements outlined in 7.7 and 7.8 are met, and the school does not exploit any imbalance of power in the relationship between the school and the child.

- Consent

.1. Consent must be a positive indication. It cannot be inferred from silence, inactivity or pre-ticked boxes.

.2. Consent will only be accepted where it is freely given, specific, informed and an unambiguous indication of the individual’s wishes.

.3. Where consent is given, a record will be kept documenting how and when consent was given.

.4. The school ensures that consent mechanisms meet the standards of the GDPR. Where the standard of consent cannot be met, an alternative legal basis for processing the data must be found, or the processing must cease.

.5. Consent accepted under the DPA will be reviewed to ensure it meets the standards of the GDPR; however, acceptable consent obtained under the DPA will not be reobtained.

.6. Consent can be withdrawn by the individual at any time.

.7. Where a child is of primary school age the consent of the persons with parental responsibility will be sought prior to the processing of their data, except where the processing is related to preventative or counselling services offered directly to a child.

.8. Children aged 12 and above are generally regarded to be mature enough to understand their rights and the implications of processing of their data. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis, taking into account the requirements in 7.2.

- Sharing Data without Consent

.1. The school may share information without consent in specific circumstances. To determine whether information can be shared with consent, the school will identify one of the other lawful bases for processing:

- Contract – the processing is necessary for a contract held between the school and individual, or because the individual has asked the school to take specific tests before entering into a contract.
- Legal obligation – the processing is necessary for the school to comply with the law (not including contractual obligations).
- Vital interests – the processing is necessary to protect someone's life.
- Public task – the processing is necessary for the school to perform a task in the public interest or for its official functions, and the task or function has a clear basis in law.
- Legitimate interests – the processing is necessary for the school's legitimate interests or the legitimate interests of a third party, unless there is good reason to protect the individual's personal data which overrides those legitimate interests.

.2. Where the school is able to justify one of the lawful bases outlined in 8.1, an exemption applies, or there is a requirement under another law, information may be shared without consent.

.3. Specifically, the GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe, and information may be shared without consent if to gain consent would place a child at risk.

- The right to be informed

.1. Adults and children have the same right to be informed about how the school uses their data.

.2. The privacy notice supplied to individuals in regards to the processing of their personal data will be written in clear, plain, age appropriate language which is concise, transparent, easily accessible and free of charge.

.3. In relation to data obtained both directly from the data subject and not obtained directly from the data subject, the following information will be supplied within the privacy notice:

- The identity and contact details of the controller (and where applicable, the controller's representative) and the DPO.
- The purpose of, and the legal basis for, processing the data.
- The legitimate interests of the controller or third party.
- Any recipient or categories of recipients of the personal data.
- Details of transfers to third countries and the safeguards in place.
- The retention period of criteria used to determine the retention period.
- The existence of the data subject's rights, including the right to: — Withdraw consent at any time. — Lodge a complaint with a supervisory authority.
- The existence of automated decision making, including profiling, how decisions are made, the significance of the process and the consequences.

.4. Where data is obtained directly from the data subject, information regarding whether the provision of personal data is part of a statutory or contractual requirement, as well as any possible consequences of failing to provide the personal data, will be provided.

.5. Where data is not obtained directly from the data subject, information regarding the categories of personal data that the school holds, the source that the personal data originates from and whether it came from publicly accessible sources, will be provided.

.6. For data obtained directly from the data subject, this information will be supplied at the time the data is obtained.

.7. In relation to data that is not obtained directly from the data subject, this information will be supplied:

- Within one month of having obtained the data.
- If disclosure to another recipient is envisaged, at the latest, before the data are disclosed.
- If the data are used to communicate with the individual, at the latest, when the first communication takes place.

- The right of access

.1. Individuals have the right to obtain confirmation that their data is being processed.

.2. Individuals have the right to submit a subject access request (SAR) to gain access to their personal data in order to verify the lawfulness of the processing.

.3. The academy will verify the identity of the person making the request before any information is supplied.

.4. A copy of the information will be supplied to the individual free of charge; however, the school may impose a 'reasonable fee' to comply with requests for further copies of the same information.

.5. Where a SAR has been made electronically, the information will be provided in a commonly used electronic format.

.6. Where a request is manifestly unfounded, excessive or repetitive, a reasonable fee will be charged.

.7. All fees will be based on the administrative cost of providing the information.

.8. All requests will be responded to without delay and at the latest, within one month of receipt.

.9. In the event of numerous or complex requests, the period of compliance will be extended by a further two months. The individual will be informed of this extension, and will receive an explanation of why the extension is necessary, within one month of the receipt of the request.

.10. Where a request is manifestly unfounded or excessive, the trust holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the supervisory authority and to a judicial remedy, within one month of the refusal.

.11. In the event that a large quantity of information is being processed about an individual, the trust will ask the individual to specify the information the request is in relation to.

.12. We may not disclose information for a variety of reasons, such as if it:

- Might cause serious harm to the physical or mental health of the pupil or another individual
- Would reveal that the child is being or has been abused, or is at risk of abuse, where the disclosure of that information would not be in the child's best interests

- Would include another person's personal data that we can't reasonably anonymise, and we don't have the other person's consent and it would be unreasonable to proceed without it
- Is part of certain sensitive documents, such as those related to crime, immigration, legal proceedings or legal professional privilege, management forecasts, negotiations, confidential references, or exam scripts

- The Right to Erasure

.1. Individuals are entitled to have any inaccurate or incomplete personal data rectified.

.2. Where the personal data in question has been disclosed to third parties, the academy will inform them of the rectification where possible.

.3. Where appropriate, the academy will inform the individual about the third parties that the data has been disclosed to.

.4. Requests for rectification will be responded to within one month; this will be extended by two months where the request for rectification is complex.

.5. Where no action is being taken in response to a request for rectification, the academy will explain the reason for this to the individual, and will inform them of their right to complain to the supervisory authority and to a judicial remedy.

- The Right to Rectification

.1. Individuals hold the right to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

.2. Individuals have the right to erasure in the following circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed
- When the individual withdraws their consent
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- The personal data is required to be erased in order to comply with a legal obligation
- The personal data is processed in relation to the offer of information society services to a child

.3. The school has the right to refuse a request for erasure where the personal data is being processed for the following reasons:

- To exercise the right of freedom of expression and information

- To comply with a legal obligation for the performance of a public interest task or exercise of official authority
- For public health purposes in the public interest
- For archiving purposes in the public interest, scientific research, historical research or statistical purposes
- The exercise or defence of legal claims

.4. As a child may not fully understand the risks involved in the processing of data when consent is obtained, special attention will be given to existing situations where a child has given consent to processing and they later request erasure of the data, regardless of age at the time of the request.

.5. Where personal data has been disclosed to third parties, they will be informed about the erasure of the personal data, unless it is impossible or involves disproportionate effort to do so.

.6. Where personal data has been made public within an online environment, the academy will inform other organisations who process the personal data to erase links to and copies of the personal data in question.

- The Right to Restrict Processing

.1. Individuals have the right to block or suppress the school's processing of personal data.

.2. In the event that processing is restricted, the academy will store the personal data, but not further process it, guaranteeing that just enough information about the individual has been retained to ensure that the restriction is respected in future.

.3. The trust will restrict the processing of personal data in the following circumstances:

- Where an individual contests the accuracy of the personal data, processing will be restricted until the school has verified the accuracy of the data
- Where an individual has objected to the processing and the academy is considering whether their legitimate grounds override those of the individual
- Where processing is unlawful and the individual opposes erasure and requests restriction instead
- Where the academy no longer needs the personal data but the individual requires the data to establish, exercise or defend a legal claim

.4. If the personal data in question has been disclosed to third parties, the school will inform them about the restriction on the processing of the personal data, unless it is impossible or involves disproportionate effort to do so.

.5. The school will inform individuals when a restriction on processing has been lifted.

- The Right to Data Portability

.1. Individuals have the right to obtain and reuse their personal data for their own purposes across different services.

.2. Personal data can be easily moved, copied or transferred from one IT environment to another in a safe and secure manner, without hindrance to usability.

.3. The right to data portability only applies in the following cases:

- To personal data that an individual has provided to a controller
- Where the processing is based on the individual's consent or for the performance of a contract
- When processing is carried out by automated means

.4. Personal data will be provided in a structured, commonly used and machine-readable form.

.5. The school will provide the information free of charge.

.6. Where feasible, data will be transmitted directly to another organisation at the request of the individual.

.7. The academy is not required to adopt or maintain processing systems which are technically compatible with other organisations.

.8. In the event that the personal data concerns more than one individual, the academy will consider whether providing the information would prejudice the rights of any other individual.

.9. The academy will respond to any requests for portability within one month.

.10. Where the request is complex, or a number of requests have been received, the timeframe can be extended by two months, ensuring that the individual is informed of the extension and the reasoning behind it within one month of the receipt of the request.

.11. Where no action is being taken in response to a request, the academy will, without delay and at the latest within one month, explain to the individual the reason for this and will inform them of their right to complain to the supervisory authority and to a judicial remedy.

- The Right to Object

.1. The academy will inform individuals of their right to object at the first point of communication, and this information will be outlined in the privacy notice and explicitly brought to the

attention of the data subject, ensuring that it is presented clearly and separately from any other information.

.2. Individuals have the right to object to the following:

- Processing based on legitimate interests or the performance of a task in the public interest
- Direct marketing
- Processing for purposes of scientific or historical research and statistics.

.3. Where personal data is processed for the performance of a legal task or legitimate interests:

- An individual's grounds for objecting must relate to his or her particular situation.
- The academy will stop processing the individual's personal data unless the processing is for the establishment, exercise or defence of legal claims, or, where the academy can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual.

.4. Where personal data is processed for direct marketing purposes:

- The academy will stop processing personal data for direct marketing purposes as soon as an objection is received.
- The academy cannot refuse an individual's objection regarding data that is being processed for direct marketing purposes.

.5. Where personal data is processed for research purposes:

- The individual must have grounds relating to their particular situation in order to exercise their right to object.
- Where the processing of personal data is necessary for the performance of a public interest task, the school is not required to comply with an objection to the processing of the data.

.6. Where the processing activity is outlined above, but is carried out online, the school will offer a method for individuals to object online.

- Automated Decision Making and Profiling

.1. Individuals have the right not to be subject to a decision when:

- It is based on automated processing, e.g. profiling.
- It produces a legal effect or a similarly significant effect on the individual.

.2. The trust will take steps to ensure that individuals are able to obtain human intervention, express their point of view, and obtain an explanation of the decision and challenge it.

.3. When automatically processing personal data for profiling purposes, the academy will ensure that the appropriate safeguards are in place, including:

- Ensuring processing is fair and transparent by providing meaningful information about the logic involved, as well as the significance and the predicted impact.

- Using appropriate mathematical or statistical procedures.
- Implementing appropriate technical and organisational measures to enable inaccuracies to be corrected and minimise the risk of errors.
- Securing personal data in a way that is proportionate to the risk to the interests and rights of the individual and prevents discriminatory effects

.4. Automated decisions must not concern a child or be based on the processing of sensitive data, unless:

- The academy has the explicit consent of the individual.
- The processing is necessary for reasons of substantial public interest on the basis of Union/Member State law.

- Privacy by Design and Privacy Impact Assessments

.1. The trust will act in accordance with the GDPR by adopting a privacy by design approach and implementing technical and organisational measures which demonstrate how the school has considered and integrated data protection into processing activities

.2. Data protection impact assessments (DPIAs) will be used to identify the most effective method of complying with the school's data protection obligations and meeting individuals' expectations of privacy.

.3. DPIAs will allow the school to identify and resolve problems at an early stage, thus reducing associated costs and preventing damage from being caused to the school's reputation which might otherwise occur.

.4. A DPIA will be carried out when using new technologies or when the processing is likely to result in a high risk to the rights and freedoms of individuals.

.5. A DPIA will be used for more than one project, where necessary.

.6. High risk processing includes, but is not limited to, the following:

- Systematic and extensive processing activities, such as profiling
- Large scale processing of special categories of data or personal data which is in relation to criminal convictions or offences
- The use of CCTV.

.7. The school will ensure that all DPIAs include the following information:

- A description of the processing operations and the purposes

- An assessment of the necessity and proportionality of the processing in relation to the purpose
- An outline of the risks to individuals
- The measures implemented in order to address risk

.8. Where a DPIA indicates high risk data processing, the school will consult the ICO to seek its opinion as to whether the processing operation complies with the GDPR.

- Data Breaches

.1. The term 'personal data breach' refers to a breach of security which has led to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

.2. The trust will ensure that all staff members are made aware of, and understand, what constitutes a data breach as part of their CPD training. This will be carried out annually by the DPO.

.3. Where a breach is likely to result in a risk to the rights and freedoms of individuals, the relevant supervisory authority will be informed.

.4. All notifiable breaches will be reported to the relevant supervisory authority within 72 hours of the school becoming aware of it.

.5. The risk of the breach having a detrimental effect on the individual, and the need to notify the relevant supervisory authority, will be assessed on a case-by-case basis.

.6. In the event that a breach is likely to result in a high risk to the rights and freedoms of an individual, the trust will notify those concerned directly.

.7. A 'high risk' breach means that the threshold for notifying the individual is higher than that for notifying the relevant supervisory authority.

.8. In the event that a breach is sufficiently serious, the public will be notified without undue delay.

.9. Effective and robust breach detection, investigation and internal reporting procedures are in place at each academy, which facilitate decision-making in relation to whether the relevant supervisory authority or the public need to be notified.

.10. Within a breach notification, the following information will be outlined:

- The nature of the personal data breach, including the categories and approximate number of individuals and records concerned

- The name and contact details of the DPO
- An explanation of the likely consequences of the personal data breach
- A description of the proposed measures to be taken to deal with the personal data breach
- Where appropriate, a description of the measures taken to mitigate any possible adverse effects

.11. Failure to report a breach when required to do so may result in a fine, as well as a fine for the breach itself.

- Data Security

.1. Confidential paper records will be kept in a locked filing cabinet, drawer or safe, with restricted access.

.2. Confidential paper records will not be left unattended or in clear view anywhere with general access.

.3. Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed up off-site.

.4. No personal data is saved on removable storage or a portable device.

.5. All electronic devices are password-protected to protect the information on the device in case of theft.

.6. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.

.7. Trustees, staff and governors will not use their personal laptops or computers for school purposes.

.8. All necessary members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

.9. Emails containing sensitive or confidential information are password-protected if there are unsecure servers between the sender and the recipient.

.10. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

.11. When sending confidential information by fax, staff will always check that the recipient is correct before sending.

.12. Where personal information that could be considered private or confidential is taken off the premises, either in electronic or paper format, staff will take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the academy premises accepts full responsibility for the security of the data.

.13. Before sharing data, all staff members will ensure:

- They are allowed to share it.
- That adequate security is in place to protect it.
- Who will receive the data has been outlined in a privacy notice.

.14. Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.

.15. The physical security of the trusts buildings and storage systems, and access to them, is reviewed on an annual basis. If an increased risk in vandalism/burglary/theft is identified, extra measures to secure data storage will be put in place.

.16. Northern Lights Learning Trust takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.

.17. The Chief Operating Officer is responsible for ensuring continuity and recovery measures are in place to ensure the security of protected data

- Publication of Information

.1. Northern Lights Learning Trust publishes a publication scheme on its or its academies website outlining classes of information that will be made routinely available, including:

- Policies and procedures
- Annual reports
- Financial information

.2. Classes of information specified in the publication scheme are made available quickly and easily on request.

.3. Northern Lights Learning Trust will not publish any personal information, including photos, on its or its academies websites without the permission of the affected individual.

.4. When uploading information to the school website, staff are considerate of any metadata or deletions which could be accessed in documents and images on the site.

- CCTV and Photography

.1. The trust understands that recording images of identifiable individuals constitutes as processing personal information, so it is done in line with data protection principles.

.2. Individual academies within the trust notifies all pupils, staff and visitors of the purpose for collecting CCTV images via notice boards, letters and email.

.3. Cameras are only placed where they do not intrude on anyone's privacy and are necessary to fulfil their purpose.

.4. CCTV footage will be kept for one month for security purposes; the Headteacher in each academy is responsible for keeping the records secure and allowing access. Where required for a legitimate reason, a downloaded copy of CCTV footage may be stored securely for a longer period. When no longer required, this footage is securely deleted.

.5. The school will always indicate its intentions for taking photographs of pupils and will retrieve permission before publishing them.

.6. Written permission will be sought from parents of the pupil at the start of each academic year regarding the use of images/video footage of pupils in a publication, such as the academy/trust website, prospectus, or recordings of school plays/events. This permission can be amended at any time through the year.

.7. Precautions, as outlined in the Internet Policy, are taken when publishing photographs of pupils, in print, video or on the academy or trust website.

.8. Images captured by individuals for recreational/personal purposes, and videos made by parents for family use, are exempt from the GDPR.

.9. We use CCTV in various locations around the school site to ensure it remains safe. We will follow the ICO's guidance for the use of CCTV, and comply with data protection principles.

.10. We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.

.11. Any enquiries about the CCTV system should be directed to the DPL.

- Data Retention

.1. Data will not be kept for longer than is necessary.

.2. Unrequired data will be deleted as soon as practicable.

.3. Some educational records relating to former pupils or employees of the school may be kept for an extended period for legal reasons, but also to enable the provision of references or academic transcripts.

.4. Paper documents will be shredded or pulped, and electronic memories scrubbed clean or destroyed, once the data should no longer be retained.

- DBS Data

.1. All data provided by the DBS will be handled in line with data protection legislation; this includes electronic communication.

.2. Data provided by the DBS will never be duplicated.

.3. Any third parties who access DBS information will be made aware of the data protection legislation, as well as their responsibilities as a data handler