



Policy: Data Protection Policy

Policy reference no: 027

Date: September 2023

Person responsible for policy: Stephen Dean, Chief Executive Officer

Authorised by: Board of Trustees

Review date: December 2025

This Policy applies to all academies within the Primary QuEST Multi-Academy Trust. Primary QuEST is a Church of England Trust which seeks to ensure all pupils flourish, together in a supportive and caring Christian environment.

Together in LIFE, flourishing through LIFE, faith for LIFE

Psalm 139 begins:

*O Lord, you have searched me and know me.
You know when I sit down and when I rise up;
You discern my thoughts from afar...
And in verse 6 the Psalmist concludes:
Such knowledge is too wonderful for me;
it is so high I cannot attain it.*

From this psalm we understand that there are limits to the knowledge we are to know, even about ourselves. The PQ Trust should not need to record information, for instance information about a family, other than information beneficial to a child's education and well-being.

Jesus provides an example of this at his trial. Pilate asked Jesus "Where are you from?" (John 19.9). Jesus gave no answer. Pilate was not the right person for Jesus to answer that question to. Any answer Jesus gave would have been misused at his trial. The right person has access to data which is appropriate for them to hold. A person of faith will understand Jesus' origins in a quite a different way to a Roman politician; who, we find later on in the chapter, unjustly misuses his power against Jesus.

Primary QuEST Multi-Academy Trust collects and uses personal information about staff, pupils, parents and other individuals who come into contact with one of the schools in the trust. This information is gathered in order to enable it to provide education and the associated functions of the trust. In addition, there may be a legal requirement to collect and use information to ensure that the schools comply with statutory obligations.

Primary QuEST has a duty to be registered, as Data Controllers, with the Information Commissioner's Office (ICO) detailing the information held and its use. These details are then available on the ICO's website.

Schools also have a duty to issue Privacy Notices when collecting information. Each notice will summarise the information held, why it is held, and the other parties to whom

it may be passed on. The schools may ask you to share information with us at various times. We will always ask for consent, and we will explain what we are asking for and why we are asking for it.

Purpose

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act (2018), and other related legislation. It will apply to all personal information irrespective of whether it is held in paper files or electronically and regardless of the way it is collected, used, recorded, stored or destroyed.

The trust has to collect certain data because it is an educational establishment and under the terms of the DPA (2018):

'6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'

In addition, the trust must process some data which, is special category data, and so is also bound by this condition of the DPA (2018):

'9(2)(d) - processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects.'

All staff involved with the collection, use and disclosure of personal data will be aware of their duties and responsibilities by being appropriately trained. They will all adhere to this policy and the requirements of DPA (2018).

What is Personal Information?

Personal information, or data, is defined as data which relates to a living individual who can be identified from that data, or other information held.

General Statement

The trust is always committed to adhering to data protection principles. Respecting data and the individual's rights to privacy. Therefore, the trust will:

- Inform individuals why the information is being collected when it is collected
- Inform individuals when their information is shared, and why and with whom it was shared
- Check the quality and the accuracy of the information it holds
- Ensure that information is not retained for longer than is necessary
- Ensure that when obsolete information is destroyed that it is done so appropriately and securely
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
- Share information with others only when it is legal and appropriate to do so
- Set out procedures to ensure compliance with the duty to respond to requests for access to personal information, known as Subject Access Requests

- Ensure our staff are trained, fully understand, and follow, our policies and procedures

Review

This policy will be reviewed when it is deemed appropriate, but no less frequently than every 3 years. The policy review will be undertaken by the CEO who may liaise with the Data Protection Officer.

Contacts

If you have any enquires in relation to this policy, please contact Stephen Dean, CEO, Primary QuEST.

Complaints

Complaints will be dealt with in accordance with the trust's complaints policy. Complaints relating to information handling may be referred to the Information Commissioner (the statutory regulator).

Further advice and information is available from the Information Commissioner's Office, www.ico.gov.uk or telephone 01625 545700