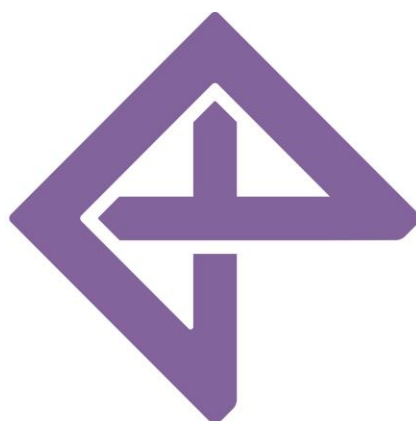


Data Protection policy

Elements Diocesan Learning Trust



Elements
Diocesan Learning Trust

Flourishing together, in the love of God.

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Together we flourish, in the love of God

Elements Diocesan Learning Trust is a company limited by guarantee registered in England and Wales with the company number 13588310.
Registered address: 16, Lowesmoor Wharf, Lowesmoor, Worcester. WR1 2RS.

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1. Vision and Values

Our vision has been developed to enable the coming together of like-minded Primary Schools in Dudley – schools that are separate, discrete *elements* that choose to coalesce as a cohesive whole to speak with one shared voice in education within the Borough of Dudley. Each person in these school communities, children, and adults alike, are also *elements* in bringing to fruition an education that enables their own flourishing and that of others. They are unique individuals, each with their own agency and characteristics, but who have an exponential effect when working together with a shared vision and purpose.

This is the vision in which the headteachers, governors and wider stakeholders have placed their trust and it is essential that it is upheld at every stage.

Each school, despite sharing some similarities, has its own unique context, community, culture, ethos, vision, and values. These will be honoured at all times as part of Elements Diocesan Learning Trust.

The vision is deeply rooted in, and is an outworking of, the Church of England’s Vision for Education. Elements Diocesan Learning Trust is committed in being ‘Deeply Christian: Serving the Common Good’, inspired by the particular scripture in John 10:10 where Jesus declares *‘I have come that they may have life, and have it to the full’*. These words, combined with the vision’s four main guiding *elements* - educating for Wisdom, Knowledge & Skills; Hope & Aspiration; Community & Living Well Together; and Dignity & Respect form the core vision for Elements Diocesan Learning Trust. At times, it is expected that interpretation of what the vision means in practice will vary between individuals and that there will be differences of opinion. At such times, discussion around decisions and actions will be respectful, honouring the four strands of the vision itself and remembering the original reasons for this collaboration.

These core *elements* of the Church of England’s Vision for Education have supported the formation of our founding core values.

- **Wisdom** – The decisions we take are wise and are based on informed discussions and evidence and aimed at ensuring we achieve the best outcomes for all without forsaking our values
- **Hope** – we have hope for a positive future and always finding positive outcomes
- **Honesty** – we are honest with all inside and outside our organisation, whilst being sensitive to how we deliver these messages
- **Community and Helpfulness** – we work in co-operation and partnership with all staff and wider stakeholders
- **Dignity and Compassion** – we treat all those within and outside our organisation with dignity, irrespective of the circumstances, and we show everyone compassion for the difficulties that they are experiencing
- **Respect** – we are respectful to all, dedicated to ensuring inclusivity and diversity with those that we work with and for others that meet, and our actions may affect.
- **Integrity** – we have strong principles rooted in our Christian mission that lead our actions and decisions

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2. Legal Obligations

Recital 74 of the UK General Data Protection Regulation (UK GDPR) states that: *‘The responsibility and liability of the controller for any processing of personal data carried out by the controller or on the controller’s behalf should be established. In particular the controller should be obliged to implement appropriate and effective measures and be able to demonstrate the compliance of processing activities with the Regulation, including the effectiveness of the measures. Those measures should take into account the nature, scope, context and purposes of the processing and the risk to the rights and freedoms of natural persons.’*

To this end, Elements Diocesan Learning Trust (‘the Trust’), comprising the member schools and central team, has adopted the Policy as specified below.

3. Scope

An essential activity within the Trust is the requirement to gather and process information about its pupils, staff, parents and other individuals who have contact with it, in order to enable it to provide education and other associated functions.

In addition, there may be a legal requirement to collect and use information to ensure that the Trust complies with its statutory obligations.

The UK GDPR defines special category information as ‘information about an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data’.

Before processing ‘special category’ information the Trust will identify and document the lawful basis for processing this information.

The Trust will process special categories of personal information only in certain situations. This will be done in accordance with Data Protection Law and other related government legislation.

This policy applies to employees and pupils of the Trust. It also applies to temporary staff, volunteers, and members, trustees and governors working on behalf of the Trust.

The Trust – acting as a custodian of personal data – recognises its moral duty to ensure that it is handled properly and confidentially at all times, irrespective of whether it is held on paper or by electronic means. This covers the whole lifecycle, including:

- the obtaining of personal data;
- the storage and security of personal data;
- the use of personal data;
- the disposal/destruction of personal data.

The Trust also has a responsibility to ensure that data subjects have appropriate access to details regarding personal information relating to them.

4. Objectives

By following and maintaining strict safeguards and controls, the Trust will:

- acknowledge the rights of individuals to whom personal data relate, and ensure that these rights may be exercised in accordance with Data Protection Law;
- ensure that individuals are fully informed about the collection and use of personal data through the publication of the Trust’s Privacy Notices;
- collect and process personal data which is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- ensure that adequate steps are taken to ensure the accuracy and currency of data;
- ensure that for all personal data, appropriate security measures are taken – both technically and organisationally – to protect against damage, loss or abuse;

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- ensure that the movement of personal data is done in a lawful way – both inside and outside the organisation – and that suitable safeguards exist at all times.

Achieved by In order to support these objectives, the Trust will:

- have ‘**Senior Information Risk Owners**’ (SIROs) to ensure that there is accountability and that Information Risk is recognised at a senior level;
- have a designated ‘**Data Protection Officer**’ (DPO) to meet the Trust’s obligations under Article 37 of UK GDPR;
- ensure that all activities that relate to the processing of personal data have appropriate safeguards and controls in place to ensure information security and compliance with Data Protection Law;
- ensure that all contracts and service level agreements between the Trust and external third parties (including contract staff – where personal data is processed) include the relevant Data Protection clauses and appropriate organisational and technological measures will be put in place to safeguard the data;
- ensure that all staff (**including volunteer staff**) acting on behalf of the Trust understand their responsibilities regarding information security under the Act, and that they receive the appropriate training/instruction and supervision so that they carry these duties out effectively and consistently and are given access to personal information that is appropriate to the duties they undertake;
- ensure that all third parties acting on the Trust’s behalf are given access to personal information that is appropriate to the duties they undertake and no more;
- ensure that any requests for access to personal data are handled courteously, promptly and appropriately, ensuring that either the data subject or their authorised representative have a legitimate right to access under Data Protection Law, that their request is valid, and that information provided is clear and unambiguous;
- ensure that all staff are aware of the Data Protection Policy and Guidance;
- review this policy and the safeguards and controls that relate to it annually to ensure that they are still relevant, efficient and effective.

This Policy and Procedure and the Subject Access Information material will be made available in other formats where necessary.

Please follow this link to the [Information Commissioner's Office \(ICO\)](#) website which provides further detailed guidance on a range of topics, including individuals’ rights, exemptions from the Act, dealing with subject access requests, and how to handle requests from third parties for personal data to be disclosed.

5. Version Control

This policy will be evaluated every three years or more frequently as required.

6. Further information

For further information, please contact:

YourIG Data Protection Officer Service

Dudley MBC, The Council House, Dudley, West Midlands, DY1 1HF

Email: YourIGDPOService@dudley.gov.uk

Tel: 01384 815607

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