



Diocese of Salisbury
Academy Trust
'Beyond expectations for all of God's children'

Data Protection Policy

Policy Date: February 2026

Review Date: February 2029

This policy applies to all DSAT schools

Contents

1.	Summary of changes	3
2.	Policy statement	4
3.	About this policy	4
4.	Definition of data protection terms	4
5.	Data Protection Officer	4
6.	Data protection principles	5
7.	Fair and lawful processing	5
8.	Vital Interests	6
9.	Consent	7
10.	Processing for limited purposes	7
11.	Notifying data subjects	8
12.	Internal Complaint Handling	8
13.	Adequate, relevant and non-excessive processing	9
14.	Accurate data	9
15.	Timely processing	9
16.	Processing in line with data subject's rights	9
17.	The Right of Access to Personal Data	9
18.	The Right to Object	10
19.	The Right to Rectification	10
20.	The Right to Restrict Processing	10
21.	The Right to Be Forgotten	11
22.	Right to Data Portability	12
23.	Data security	12
24.	Security procedures include:	12
25.	Data Protection Impact Assessments	13
26.	Disclosure and sharing of personal information	13
27.	Data Processors	13
28.	Images and Videos	14
29.	CCTV	15
30.	Changes to this policy	15
31.	Definitions	16

1. Summary of changes

Policy ref.		Detail
Throughout	Replacement	Information Commission (IC) replaces the Information Commissioners Office (ICO) as a corporate body in 2026.
3.1	Addition	Reference to new legislation: Data (Use and Access) Act 2025 (DUA Act), passed June 2025, which entered Stage 4 (final) Commencement February 2026.
5.1	Replacement	New data protection officer's name, details.
7.2.7	Modification	Prescribed by DUA. Reference to the expectation that data protection complaints are first pursued through the Trust's internal complaints process.
7.4.1	Addition	Prescribed by DUA. Information about processing recognised legitimate interests as defined by the DUA for the purposes of safeguarding vulnerable individuals, crime prevention, and responding to emergencies.
7.4.2	Addition	Other key legislative references: ISS, KCSiE etc.
S12	Addition	New section. Prescribed by DUA: Internal Complaint Handling e-form and process.
17.1	Addition	Prescribed by DUA. The Trust will conduct "reasonable and proportionate" searches when responding to requests.
17.2	Addition	Prescribed by DUA: Stop the Clock. The facility to pause the one-month response time, to seek further information or clarification from the requester.
26.1	Removal	Reference to Education and Skills Funding Agency "ESFA". Agency was subsumed by DfE March 2025.
27.1	Addition	Required specific provider information added.

2. Policy statement

- 2.1 Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities as a Trust we will collect, store and process personal data about our pupils, workforce, parents and others. This makes DSAT a data controller in relation to that personal data.
- 2.2 We are committed to the protection of all personal data and special category personal data for which we are the data controller.
- 2.3 The law imposes significant fines for failing to lawfully process and safeguard personal data and failure to comply with this policy may result in those fines being applied.
- 2.4 All members of our workforce must comply with this policy when processing personal data on our behalf. Any breach of this policy may result in disciplinary or other action.
- 2.5 This policy applies to each Academy within the Trust as well as to the Central Team. It also applies to governors and volunteers involved in our Academies, including parent teacher associations and the like.

3. About this policy

- 3.1 The types of personal data that we may be required to handle include information about pupils, parents, our workforce, and others that we deal with. The personal data which we hold is subject to certain legal safeguards specified in the UK General Data Protection Regulation ('GDPR'), the [Data Protection Act 2018], Data (Use and Access) Act 2025 (DUA), and other regulations (together 'Data Protection Legislation').
- 3.2 This policy and any other documents referred to in it set out the basis on which we will process any personal data we collect from data subjects, or that is provided to us by data subjects or other sources.
- 3.3 This policy does not form part of any employee's contract of employment and may be amended at any time.
- 3.4 This policy sets out rules on data protection and the legal conditions that must be satisfied when we process personal data.

4. Definition of data protection terms

- 4.1 All defined terms in this policy are indicated in **bold** text, and a list of definitions is included in the [Definition](#) section of this policy.

5. Data Protection Officer

- 5.1 As a Trust we are required to appoint a Data Protection Officer ("DPO"). Our DPO is:

Moira Lyons-Montgomery
Diocese of Salisbury Academy Trust
The Avenue
Wilton
SP2 0FG
dataprotection@dsat.org.uk

- 5.2 The DPO is responsible for ensuring compliance with the Data Protection Legislation and with this policy. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the DPO.

5.3 The DPO is also the central point of contact for all data subjects and others in relation to matters of data protection.

6. Data protection principles

6.1 Anyone **processing personal data** must comply with the data protection principles. These provide that **personal data** must be:

6.1.1 **Processed fairly and lawfully and transparently** in relation to the data subject;

6.1.2 **Processed** for specified, lawful purposes and in a way which is not incompatible with those purposes;

6.1.3 **Adequate**, relevant and not excessive for the purpose;

6.1.4 **Accurate** and up to date;

6.1.5 Not kept for any longer than is necessary for the purpose; and

6.1.6 **Processed** securely using appropriate technical and organisational measures.

Personal Data must also:

6.1.7 be **processed** in line with **data subjects'** rights;

6.1.8 not be **transferred** to people or organisations situated in other countries without adequate protection.

6.2 We will comply with these principles in relation to any **processing of personal data** by the Trust.

7. Fair and lawful processing

7.1 Data Protection Legislation is not intended to prevent the **processing of personal data**, but to ensure that it is done fairly and without adversely affecting the rights of the **data subject**.

7.2 For **personal data** to be **processed** fairly, **data subjects** must be made aware:

7.2.1 **that the personal data is being processed;**

7.2.2 **why the personal data is being processed;**

7.2.3 **what the lawful basis is for that processing** (see below);

7.2.4 **whether the personal data will be shared**, and if so with whom;

7.2.5 **the period for which the personal data will be held;**

7.2.6 **the existence of the data subject's rights in relation to the processing of that personal data;** and

7.2.7 **the right of the data subject to raise a complaint with the Trust and with the Information Commission in relation to any processing.**

- 7.3 We will only obtain such **personal data** as is necessary and relevant to the purpose for which it was gathered and will ensure that we have a lawful basis for any **processing**.
- 7.4 For **personal data** to be **processed** lawfully, it must be **processed** on the basis of one of the legal grounds set out in the Data Protection Legislation. We will normally **process personal data** under the following legal grounds:
- 7.4.1 **Recognised Legitimate Interests:** We may process personal data where it is necessary for a recognised legitimate interest as defined by the DUA. This **includes processing for the purposes of safeguarding vulnerable individuals, crime prevention, and responding to emergencies**. In these specific cases, a formal balancing test of interests is not required.
- 7.4.2 where the processing is necessary for the **performance of a contract** between us and the data subject, such as an employment contract;
- 7.4.3 where the processing is **necessary to comply with a legal obligation** that we are subject to; (e.g. the Education Act 2011, The Education (Independent School Standards) Regulations 2014, Keeping Children Safe in Education, etc)
- 7.4.4 where the law otherwise allows us to process the personal data or we are carrying out a task in the **public interest**; and
- 7.4.5 where none of the above apply then we will seek the **consent of the data subject** to the processing of their personal data.
- 7.5 When **special category personal data** is being processed then an additional legal ground must apply to that processing. We will normally only **process special category personal data** under following legal grounds:
- 7.5.1 where the **processing** is necessary for employment law purposes, for example in relation to sickness absence;
- 7.5.2 where the **processing** is necessary for reasons of substantial public interest, for example for the purposes of equality of opportunity and treatment;
- 7.5.3 where the **processing** is necessary for health or social care purposes, for example in relation to pupils with medical conditions or disabilities; and
- 7.5.4 where none of the above apply then we will seek the consent of the **data subject** to the **processing** of their **special category personal data**.
- 7.6 We will inform **data subjects** of the above matters by way of appropriate privacy notices which shall be provided to them when we collect the data or as soon as possible thereafter, unless we have already provided this information such as at the time when a pupil joins us.
- 7.7 If any **data user** is in doubt as to whether they can use any **personal data** for any purpose then they must contact the DPO before doing so.

8. Vital Interests

- 8.1 There may be circumstances where it is considered necessary to **process personal data** or **special category personal data** in order to protect the vital interests of a **data subject**. This

might include medical emergencies where the **data subject** is not in a position to give consent to the **processing**. We believe that this will only occur in very specific and limited circumstances. In such circumstances we would usually seek to consult with the DPO in advance, although there may be emergency situations where this does not occur.

9. Consent

- 9.1 Where none of the other bases for **processing** set out above apply then the school must seek the consent of the **data subject** before **processing** any **personal data** for any purpose.
- 9.2 There are strict legal requirements in relation to the form of consent that must be obtained from data subjects.
- 9.3 When pupils or employee join the Trust consent forms will be required to be completed in relation to them. These consents deal with the taking and use of photographs and videos of them, amongst other things. Where appropriate third parties may also be required to complete a consent form.
- 9.4 In relation to all pupils under the age of 12 years old we will seek consent from an individual with parental responsibility for that pupil.
- 9.5 We will generally seek consent directly from a pupil who has reached the age of 12, however we recognise that this may not be appropriate in certain circumstances and therefore may be required to seek consent from an individual with parental responsibility.
- 9.6 If consent is required for any other processing of personal data of any data subject then the form of this consent must:
 - 9.6.1 Inform the **data subject** of exactly what we intend to do with their **personal data**;
 - 9.6.2 Require them to positively confirm that they consent – we cannot ask them to opt-out rather than opt-in; and
 - 9.6.3 Inform the **data subject** of how they can withdraw their consent.
- 9.7 Any consent must be freely given, which means that we cannot make the provision of any goods or services or other matter conditional on a data subject giving their consent.
- 9.8 The DPO must always be consulted in relation to any consent form before consent is obtained.
- 9.9 A record must always be kept of any consent, including how it was obtained and when.

10. Processing for limited purposes

- 10.1 In the course of our activities as a Trust, we may collect and **process** the **personal data** set out in our Schedule of Processing Activities. This may include **personal data** we receive directly from a **data subject** (for example, by completing forms or by corresponding with us by mail, phone, email or otherwise) and **personal data** we receive from other sources (including, for example, local authorities, other schools, parents, other pupils or members of our **workforce**).
- 10.2 We will only process personal data for the specific purposes set out in our Schedule of Processing Activities or for any other purposes specifically permitted by Data Protection Legislation or for which specific consent has been provided by the data subject.

11. Notifying data subjects

- 11.1 If we collect **personal data** directly from **data subjects**, we will inform them about:
- 11.1.1 our identity and contact details as **Data Controller** and those of the DPO;
 - 11.1.2 the purpose or purposes and legal basis for which we intend to **process** that **personal data**;
 - 11.1.3 the types of third parties, if any, with which we will share or to which we will disclose that **personal data**;
 - 11.1.4 whether the **personal data** will be transferred outside the European Economic Area ('**EEA**') and if so the safeguards in place;
 - 11.1.5 the period for which their **personal data** will be stored, by reference to our Retention and Destruction Policy;
 - 11.1.6 the existence of any automated decision making in the **processing** of the **personal data** along with the significance and envisaged consequences of the **processing** and the right to object to such decision making; and
 - 11.1.7 the rights of the **data subject** to object to or limit processing, request information, request deletion of information or lodge a complaint with the Trust or with the Information Commission.
- 11.2 Unless we have already informed data subjects that we will be obtaining information about them from third parties (for example in our privacy notices), then if we receive personal data about a data subject from other sources, we will provide the data subject with the above information as soon as possible thereafter, informing them of where the personal data was obtained from.

12. Internal Complaint Handling

- 12.1 Under the Data (Use and Access) Act 2025 (DUAA), the Trust is under a statutory duty to acknowledge any data protection complaint within 30 days of receipt. This timeframe is strict and includes school holidays, meaning staff will ensure acknowledgments are sent even if the complaint arrives during a school holiday or break.
- 12.2 Any data subject who is concerned about the way the Trust or a school has processed their personal data has the right to lodge a complaint directly with us.
- 12.3 Upon receipt of a complaint, the Trust will:
- 12.3.1 Acknowledge receipt of the complaint within 30 days.
 - 12.3.2 Take appropriate steps to investigate and respond to the concerns raised without undue delay.
 - 12.3.3 Notify the data subject of the outcome of the complaint.
- 12.4 Complaints should be submitted using our [Data Protection Complaint Form](#)

12.5 Complaints will be logged centrally to assist with the new requirement to report (if requested by the Secretary of State) the number of complaints received in a given period.

13. Adequate, relevant and non-excessive processing

13.1 We will only collect **personal data** to the extent that it is required for the specific purpose notified to the **data subject**, unless otherwise permitted by Data Protection Legislation.

14. Accurate data

14.1 We will ensure that **personal data** we hold is accurate and kept up to date.

14.2 We will take reasonable steps to destroy or amend inaccurate or out-of-date data.

14.3 **Data subjects** have a right to have any inaccurate **personal data** rectified. See further below in relation to the exercise of this right.

15. Timely processing

15.1 We will not keep **personal data** longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all **personal data** which is no longer required.

16. Processing in line with data subject's rights

16.1 We will **process** all **personal data** in line with **data subjects'** rights, in particular their right to:

16.1.1 request access to any personal data we hold about them;

16.1.2 object to the processing of their personal data, including the right to object to direct marketing;

16.1.3 have inaccurate or incomplete personal data about them rectified;

16.1.4 restrict processing of their personal data;

16.1.5 have personal data we hold about them erased

16.1.6 have their personal data transferred; and

16.1.7 object to the making of decisions about them by automated means.

17. The Right of Access to Personal Data

17.1 **Data subjects** may request access to **personal data** we hold about them. The Trust will conduct "**reasonable and proportionate**" searches when responding to requests. Such requests will be considered in line with the Subject Access Request Procedure.

17.2 **Stop the Clock:** Under the Data (Use and Access) Act 2025 the Trust may pause the one-month response timer if it requires more information or clarification from the requester.

Stage of Request	Action / Timeline	Key Requirement under Data (Use and Access) Act 2025
Initial Receipt	One Month (starting the day the request is received).	The clock starts immediately upon receipt.
Clarification Needed	"Stop the Clock" (Pause).	If the Trust requires more information to identify the data or the requester, the response timer is paused until that information is provided.
Resuming the Search	Clock Continues.	Once the necessary information is received, the one-month timer resumes from where it was paused.
Search Standard		Staff must conduct "reasonable and proportionate" searches. You are not required to exhaust every possible location if it is disproportionate to the request.
Complex Requests	Up to Two Additional Months.	If a request is complex, the Trust can extend the deadline, but must notify the subject within the first month.

18. The Right to Object

- 18.1 In certain circumstances **data subjects** may object to us **processing** their **personal data**. This right may be exercised in relation to **processing** that we are undertaking on the basis of a legitimate interest or in pursuit of a statutory function or task carried out in the public interest.
- 18.2 An objection to **processing** does not have to be complied with where the school can demonstrate compelling legitimate grounds which override the rights of the **data subject**.
- 18.3 Such considerations are complex and must always be referred to the DPO upon receipt of the request to exercise this right.
- 18.4 In respect of direct marketing any objection to **processing** must be complied with.
- 18.5 The Trust is not however obliged to comply with a request where the **personal data** is required in relation to any claim or legal proceedings.

19. The Right to Rectification

- 19.1 If a **data subject** informs the Trust that **personal data** held about them by the Trust is inaccurate or incomplete, then we will consider that request and provide a response within one month.
- 19.2 If we consider the issue to be too complex to resolve within that period, then we may extend the response period by a further two months. If this is necessary, then we will inform the **data subject** within one month of their request that this is the case.
- 19.3 We may determine that any changes proposed by the **data subject** should not be made. If this is the case then we will explain to the **data subject** why this is the case. In those circumstances we will inform the **data subject** of their right to complain to the Information Commissioner's Office at the time that we inform them of our decision in relation to their request.

20. The Right to Restrict Processing

- 20.1 Data **subjects** have a right to "block" or suppress the **processing** of **personal data**. This means that the Trust can continue to hold the personal data but not do anything else with it.
- 20.2 The Trust must restrict the processing of personal data:

- 20.2.1 Where it is in the process of considering a request for **personal data** to be rectified (see above);
 - 20.2.2 Where the Trust is in the process of considering an objection to processing by a **data subject**;
 - 20.2.3 Where the **processing** is unlawful, but the **data subject** has asked the Trust not to delete the personal **data**; and
 - 20.2.4 Where the Trust no longer needs the **personal data** but the **data subject** has asked the Trust not to delete the **personal data** because they need it in relation to a legal claim, including any potential claim against the Trust.
- 20.3 If the Trust has shared the relevant **personal data** with any other organisation, then we will contact those organisations to inform them of any restriction, unless this proves impossible or involves a disproportionate effort.
- 20.4 The DPO must be consulted in relation to requests under this right.

21. The Right to Be Forgotten

- 21.1 Data **subjects** have a right to have **personal data** about them held by the Trust erased only in the following circumstances:
- 21.1.1 Where the **personal data** is no longer necessary for the purpose for which it was originally collected;
 - 21.1.2 When a **data subject** withdraws consent – which will apply only where the Trust is relying on the individuals consent to the **processing** in the first place;
 - 21.1.3 When a **data subject** objects to the **processing** and there is no overriding legitimate interest to continue that **processing** – see above in relation to the right to object;
 - 21.1.4 Where the **processing** of the **personal data** is otherwise unlawful;
 - 21.1.5 When it is necessary to erase the **personal data** to comply with a legal obligation; and
- 21.2 The Trust is not required to comply with a request by a **data subject** to erase their **personal data** if the **processing** is taking place:
- 21.2.1 To exercise the right of freedom of expression or information;
 - 21.2.2 To comply with a legal obligation for the performance of a task in the public interest or in accordance with the law;
 - 21.2.3 For public health purposes in the public interest;
 - 21.2.4 For archiving purposes in the public interest, research or statistical purposes; or
 - 21.2.5 In relation to a legal claim.

21.3 If the Trust has shared the relevant personal data with any other organisation then we will contact those organisations to inform them of any erasure, unless this proves impossible or involves a disproportionate effort.

21.4 The DPO must be consulted in relation to requests under this right.

22. Right to Data Portability

22.1 In limited circumstances a data subject has a right to receive their personal data in a machine readable format, and to have this transferred to other organisation.

22.2 If such a request is made then the DPO must be consulted.

23. Data security

23.1 We will take appropriate security measures against unlawful or unauthorised processing of **personal data**, and against the accidental loss of, or damage to, **personal data**

23.2 We will put in place procedures and technologies to maintain the security of all **personal data** from the point of collection to the point of destruction.

24. Security procedures include:

24.1 **Entry controls.** Any stranger seen in entry-controlled areas should be reported to the Academy Office.

24.2 **Secure lockable desks and cupboards.** Desks and cupboards should be kept locked if they hold confidential information of any kind. (Personal information is always considered confidential).

24.3 **Methods of disposal.** Paper documents should be shredded. Digital storage devices should be physically destroyed when they are no longer required. IT assets must be disposed of in accordance with the Information Commissioner's Office guidance on the disposal of IT assets.

24.4 **Equipment.** Data users must ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended.

24.5 **Working away from the school premises – paper documents.** Staff are discouraged from removing hard copy documents from the Trust's Academies and premises. Where this is unavoidable, documents should not be left unattended in a vehicle and should not be shared with friends or family members. The integrity of the documents should not be compromised at any time. Documents should be kept away from the school premises for the minimum time possible.

24.6 **Working away from the school premises – electronic working.** It is preferable that work is completed on Trust devices. Where personal devices are used, they must always be password protected by passwords not known to anyone else. Open access, shared devices, must not be used for work purposes. Staff must not use USB devices for storing documents – instead they should use the file storage facility provided through the Trust's use of Office 365.

24.7 **Document printing.** Documents containing **personal data** must be collected immediately from printers and not left on photocopiers.

24.8 Any member of staff found to be in breach of the above security measures may be subject to disciplinary action.

25. Data Protection Impact Assessments

25.1 The Trust takes data protection seriously, and will consider and comply with the requirements of Data Protection Legislation in relation to all of its activities whenever these involve the use of personal data, in accordance with the principles of data protection by design and default.

25.2 In certain circumstances the law requires us to carry out detailed assessments of proposed **processing**. This includes where we intend to use new technologies which might pose a high risk to the rights of **data subjects** because of the types of data we will be **processing** or the way that we intend to do so.

25.3 The Trust will complete an assessment of any such proposed **processing** and has a template document which ensures that all relevant matters are considered.

25.4 The DPO should always be consulted as to whether a data protection impact assessment is required, and if so how to undertake that assessment.

26. Disclosure and sharing of personal information

26.1 We may share **personal data** that we hold about **data subjects**, and without their consent, with other organisations. Such organisations include the Department for Education, Ofsted, health authorities and professionals, the Local Authority, examination bodies, other schools, and other organisations where we have a lawful basis for doing so.

26.2 The Trust will inform **data subjects** of any sharing of their **personal data** unless we are not legally required to do so, for example where **personal data** is shared with the police in the investigation of a criminal offence.

26.3 In some circumstances we will not share safeguarding information. Please refer to our Child Protection Policy.

26.4 Further detail is provided in our Schedule of Processing Activities.

27. Data Processors

27.1 We contract with various organisations who provide services to the Trust, including:

27.1.2 **Payroll provider - Edupay:** This system processes the personal data of the **workforce** to process payments.

27.1.3 **School meal and milk providers – Apetito Limited, Edwards and Ward, Sue Brady Catering, Cool Milk at School, Local Food Links, Cleverchefs Ltd, Craig's Farm Dairies, Family Action, Weyco Services:** These systems process the personal data of **pupils** to process meal requests.

27.1.4 **Occupational Health Provider - Everwell:** This organisation processes the personal data of the **workforce** to provide the Trust with advice regarding fitness to work and reasonable adjustments.

- 27.1.5 **Safeguarding Services Providers – My Concern, Local Authorities:** These organisations process the personal data of some pupils, parents and members of the **workforce** to provide timely advice regarding safeguarding matters.
 - 27.1.6 **Health and Safety Services Provider:** This system processes the personal data of some pupils and members of the **workforce** to provide timely advice regarding health and safety matters
 - 27.1.7 **HR Support Provider – My New Term:** This system processes the personal data of some members of the **workforce** to provide timely advice regarding employment.
 - 27.1.8 **Legal Support Providers:** Our providers process the personal data of some pupils and members of the **workforce** to provide timely advice regarding legal matters
 - 27.1.9 **Management Information System Provider - Arbor:** Our system processes the personal data of pupils, parents and the **workforce** in order for the Trust to maintain accurate records and communicate with parents.
 - 27.1.10 **Financial System Providers – IRIS:** These systems processes the personal data of the **workforce** to process payments.
 - 27.1.11 **IT Support Providers – Oakford Support:** This organisation processes the personal data of pupils and the **workforce** to provide IT support.
 - 27.1.12 **Governance Information Platforms.** This includes Companies House, the Salisbury Diocesan Board of Education (SDBE), Get Information About Schools (GIAS). These organisations processes the personal data of **governance volunteers and some workforce** to provide governance support and information we are required to provide by legislation.
- 27.2 In order that these services can be provided effectively we are required to transfer personal **data of data subjects** to these **data processors**.
- 27.3 **Personal data** will only be transferred to a **data processor** if they agree to comply with our procedures and policies in relation to data security, or if they put in place adequate measures themselves to the satisfaction of the Trust. The Trust will always undertake due diligence of any **data processor** before transferring the **personal data of data subjects** to them.
- 27.4 **Contracts with data processors** will comply with Data Protection Legislation and contain explicit obligations on the **data processor** to ensure compliance with the Data Protection Legislation, and compliance with the rights of **Data Subjects**.

28. Images and Videos

- 28.1 Parents and others attending Trust events are allowed to take photographs and videos of those events for domestic purposes. For example, parents can take video recordings of a school performance involving their child. The Trust does not prohibit this as a matter of policy.
- 28.2 The Trust does not however agree to any such photographs or videos being used for any other purpose, but acknowledges that such matters are, for the most part, outside of the ability of the Trust to prevent.

- 28.3 The Trust asks that parents and others do not post any images or videos which include any child other than their own child on any social media or otherwise publish those images or videos.
- 28.4 As a Trust we want to celebrate the achievements of our pupils and therefore may want to use images and videos of our pupils within promotional materials, or for publication in the media such as local, or even national, newspapers covering school events or achievements. We will seek the consent of pupils, and their parents where appropriate, before allowing the use of images or videos of pupils for such purposes.
- 28.5 Whenever a pupil begins their attendance at the Trust they, or their parent where appropriate, will be asked to complete a consent form in relation to the use of images and videos of that pupil. We will not use images or videos of pupils for any purpose where we do not have consent.

29. CCTV

- 29.1 Some premises within the Trust operate a CCTV system. Please refer to the Trust CCTV Policy.

30. Changes to this policy

- 30.1 We may change this policy at any time. Where appropriate, we will notify **data subjects** of those changes.

31. Definitions

Term	Definition
Data	This is information which is stored electronically, on a computer, or in certain paper-based filing systems
Data Subjects	For the purpose of this policy, this includes all living individuals about whom we hold personal data. This includes pupils, our workforce, staff, and other individuals. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal information
Personal Data	This means any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person
Data Controllers	These are the people who or organisations which determine the purposes for which, and the manner in which, any personal data is processed. They are responsible for establishing practices and policies in line with Data Protection Legislation. We are the data controller of all personal data used in our business for our own commercial purposes
Data Users	These are those of our workforce (including Governors and volunteers) whose work involves processing personal data. Data users must protect the data they handle in accordance with this data protection policy and any applicable data security procedures at all times
Data Processors	These includes any person or organisation that is not a data user that processes personal data on our behalf and on our instructions
Processing	This is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing also includes transferring personal data to third parties
Special Category Personal Data	This includes information about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health or condition or sexual life, or genetic or biometric data
Workforce	This includes, any individual employed by the Trust such as staff and those who volunteer in any capacity including Governors and Trustees/ Members and parent helpers