



Star

NURTURING TODAY'S **YOUNG PEOPLE**,
INSPIRING TOMORROW'S **LEADERS**

DATA PROTECTION POLICY





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Contents

Introduction	4
Aims	4
Who is responsible for the policy?.....	4
Data protection definitions.....	4
Data protection principles	5
Accountability	5
Data Protection Officer and establishment leads.....	6
Lawful processing.....	7
Consent	8
The right to be informed.....	8
The right of access	9
The right to rectification	9
The right to erasure	10
The right to restrict processing.....	10
The right to data portability.....	11
The right to object.....	12
Automated decision making and profiling.....	12
Privacy by design and privacy impact assessments	13
Data breaches	13
Security	14
Providing information over the telephone	16
Publication of information.....	16
Images: photography and videos.....	16
Data retention.....	17
Disclosure and Barring Service (DBS) data.....	17
Monitoring, evaluation and review	17



Introduction

1. Star Academies collects, processes, holds and shares personal data, and recognises the need to treat it in an appropriate and lawful manner.
2. This policy has due regard to data protection laws, which incorporate the General Data Protection Regulation (GDPR), and other legal requirements.
3. This policy sets out Star requirements for data protection and the legal conditions that must be satisfied in relation to the obtaining, handling, processing, storage, transportation and destruction of personal information.
4. To support this policy, staff shall apply associated policies and procedures¹ and participate in all training if requested to do so by Star.
5. If a member of staff considers that aspects of this policy have not been followed, this should be raised with the Senior Leadership Team of the establishment.
6. This policy does not form part of any employee's contract of employment and it may be amended at any time. Any breach of this policy will be taken seriously and may result in disciplinary action.
7. This policy will be implemented in conjunction with the following Star Academies policies:
 - Freedom of Information Policy;
 - Records Management Policy;
 - E-Security Policy; and
 - CCTV Policy.

Aims

8. To ensure Star Academies fulfils its statutory responsibilities.
9. To ensure effective security and protection for data that has been provided by individuals to Star which is required for the management and operation of its establishments.
10. To support the mission, vision and values of Star Academies and its establishments.

Who is responsible for the policy?

11. Star Academies has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory or Star framework. Star Academies has delegated day-to-day responsibility for operating the policy to Star Central, the Local Governing Body and the Head of each establishment.
12. The Local Governing Body and Senior Leadership Team at each establishment has a specific responsibility to ensure the fair application of this policy and all members of staff are responsible for supporting colleagues and ensuring its success.

Data protection definitions

13. **Data** is information which is stored electronically or in paper-based filing systems.
14. **Personal data** means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (such as a

¹ Associated policies and procedures that should be referred to are highlighted in ***bold italics*** within this Policy



name, address, date of birth or IP address) or it can be an opinion (such as a performance appraisal).

15. **Special category data** includes information about a person's racial or ethnic origin; political opinions; religious or similar beliefs; trade union membership; physical or mental health condition; or sexual orientation and sex life. It also specifically includes the processing of genetic and biometric data. Special category data can only be processed under strict conditions, and will usually require the express consent of the person concerned.
16. **Data subjects** are the individuals about whom the personal data is held.
17. **Processing** 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 including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.
18. **Data Controller** - Star Academies is registered with the Information Commissioner's Office (ICO Registration Z3350256) as the Data Controller for all of its establishments. As the Data Controller, it determines the purpose for which, and the manner in which, any personal data is processed.

Data protection principles

19. In accordance with the requirements outlined in data protection law, personal data will be:
 - processed lawfully, fairly and in a transparent manner in relation to individuals;
 - collected for specific, 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 purpose 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 is inaccurate, having regard for the purposes for which it is processed, is 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 is 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 law to safeguard the rights and freedoms of individuals; and
 - 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 and organisational measures.
20. Star Academies, as the Data Controller, is responsible for, and able to demonstrate, compliance with the principles.
21. In applying data protection law Star will also apply data protection exemptions.

Accountability

22. Star Academies, and its establishments, will implement appropriate technical and organisational measures to demonstrate that data is processed in line with data protection law.



23. Star Academies will provide comprehensive, clear and transparent **Privacy Notices**.
24. A **Record of Processing** will be maintained and kept up-to-date at each establishment. These will include the following:
 - name and details of the organisation;
 - purpose(s) of the processing;
 - description of the categories of 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.
25. Star Academies, and its establishments, 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; and
 - continuously creating and improving security features.
26. **Data Protection Impact Assessments (DPIA)** are completed when considering using new technologies for the storage, accessing or processing of personal data, or if a new requirement for processing is likely to result in a high risk to the rights and freedoms of individuals.

Data Protection Officer and establishment leads

27. The Star Academies Data Protection Officer (DPO) can be contacted at the following address:

Head of Governance and Corporate Services
Data Protection Officer
Star Academies, Shadsworth Road Blackburn, BB1 2HT
Or Email: governance@staracademies.org

28. The duties of the Data Protection Officer include:
 - informing and advising Star, and its establishments, about their obligations to comply with data protection laws and regulations; and
 - monitoring compliance with data protection laws and regulations, including managing internal data protection activities, advising on **Data Protection Impact Assessments (DPIAs)**, conducting internal audits, and providing the required training to staff.
29. The DPO will operate independently and will not be dismissed or penalised for performing their task.
30. Sufficient resources will be provided to the DPO to enable them to meet the obligations described within data protection law.
31. Data Protection Leads, nominated at each Star establishment, support the DPO. The Head of Establishment shall ensure the role is reflected within the Data Protection Lead's Job Description



and that their responsibility as first point of contact for guidance and support, is known within the establishment.

32. In the event of a data subject looking to exercise their rights, which are listed in this policy, the Data Protection Lead should ensure that these requests are forwarded to the DPO within 24 hours of receipt.

Lawful processing

33. The legal basis for processing data will be identified and documented within the **Record of Processing** prior to the data being processed.
34. Data will only be lawfully processed if one of the following conditions is satisfied:
- 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; or
 - 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).
 - the consent of the data subject has been obtained.
35. Special category data will only be processed under the following conditions:
- explicit consent of the data subject;
 - 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; or
 - 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 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 systems and services 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; or



- archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes.

Consent

36. Consent will only be sought prior to processing any data which cannot be done under any other lawful basis, such as complying with a legal or regulatory requirement.
37. Consent must be a positive indication. It cannot be inferred from silence, inactivity or pre-ticked boxes.
38. Consent will only be accepted where it is freely given, specific, informed and an unambiguous indication of the individual's wishes.
39. Where consent is given, a **Consent Record** will be kept that documents how, when and what type of consent was given.
40. Where the standard of consent cannot be met, processing will cease.
41. Consent provided under previous data protection legislation is reviewed to ensure it meets the standard of current data protection laws. However, acceptable consent obtained under previous data protection legislation will not be reobtained.
42. Consent can be withdrawn by the individual at any time.
43. Where a child is under the age of 13, the consent of parents will be sought prior to the processing of their data.
44. When gaining consent of pupils who are 13 or over, consideration will be given to the age, maturity and mental capacity of the pupil in question. Consent will only be gained from pupils where it is deemed that a pupil has a sound understanding of what they are consenting to
45. The Consent Form will be valid for the full academic year, unless the pupil's circumstances change in any way, e.g. if their parents separate, or consent is withdrawn. Additional consent forms will be required if the pupil's circumstances change.
46. If there is a disagreement over consent, or if there is no response to a consent request, it will be treated as if consent has not been given, and photographs and videos will not be taken or published of the pupil.
47. For any LAC pupils, or pupils who are adopted, the DSL will liaise with the pupil's social worker, carers or adoptive parents to establish where consent should be sought. Consideration will be given as to whether identification of a LAC pupil, or pupils who are adopted, would risk their security in any way.

The right to be informed

48. A **Privacy Notice** is supplied to individuals to provide information on the processing of their personal data. This is written in clear, plain language which is concise, transparent, easily accessible and free of charge. The **Privacy Notice** that is provided to pupils aged 13 and over is written in a clear, plain manner that the child will understand. **Privacy Notices** detail all information that is required to be provided to data subjects under data protection laws.
49. 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. This information will be supplied at the time the data is obtained.



50. Where data is not obtained directly from the data subject, information regarding the categories of personal data that Star holds, the source that the personal data originates from and whether it came from publicly accessible sources will be provided. 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 is disclosed;
 - if the data is to be used to communicate with the individual, at the latest, when the first communication takes place.

The right of access

51. Individuals have the right to obtain confirmation that their data is being processed.
52. Individuals have the right to submit a **Subject Access Request (SAR)** to gain access to their personal data.
53. A request must be made in writing to the Data Protection Officer. Star Academies also has a **Subject Access Request Form** that can be used to ensure all the legally required information is contained within the request.
54. Data Protection Leads at each establishment should forward any **SARs** to the DPO within 24 hours of receipt.
55. Star Academies is required to verify the identity of the person making the request before any information is supplied.
56. Requests are considered in line with data subject's legal rights and Star Academies' legal obligations.
57. Where a **SAR** has been made electronically, the information will be provided in a commonly used electronic format.
58. Any information supplied to the individual will be free of charge. However, Star Academies may impose a fee to comply with requests for further copies of the same information.
59. Where a request is manifestly unfounded, excessive or repetitive, a fee may be charged.
60. All fees will be based on the administrative cost of providing the information.
61. All requests will be responded to without delay and at the latest, within **one month** of receipt.
62. 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.
63. Where the request is manifestly unfounded or excessive, Star Academies 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 Information Commissioner's Office (ICO) and to a judicial remedy, within one month of the refusal.
64. In the event that a large quantity of information is being processed about an individual, Star Academies will ask the individual to specify the information the request is in relation to.

The right to rectification

65. Individuals are entitled to have any inaccurate or incomplete personal data rectified.
66. Where the personal data in question has been disclosed to third parties, Star Academies will inform them of the rectification where possible.



67. Where appropriate, Star Academies will inform the individual about third parties that the data has been disclosed to.
68. Requests for rectification will be responded to within one month. This will be extended by two months where the request for rectification is complex.
69. Where no action is being taken in response to a request for rectification, Star will explain the reason for this to the individual, and will inform them of their right to complain to the ICO and to a judicial remedy.

The right to erasure

70. Individuals hold the right to request the deletion or removal of personal data where there is no compelling reason for its continued processing.
71. 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; and
 - the personal data is processed in relation to the offer of information society services to a child.
72. Star Academies has a 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; and
 - the exercise or defence of legal claims.
73. 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.
74. Where personal data has been disclosed to third parties, they will be informed about the erasure of personal data, unless it is impossible or involves disproportionate effort to do so.
75. Where personal data has been made public within an online environment, the school 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

76. Individuals have the right to block or suppress Star Academies' processing of personal data.



77. In the event that processing is restricted, Star Academies will store the personal data, but will not process it further, guaranteeing that just enough information about the individual has been retained to ensure that the restriction is respected in future.
78. Star Academies 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 Star Academies has verified the accuracy of the data;
 - where an individual has objected to the processing and Star Academies is considering whether their legitimate grounds override those of the individual;
 - where processing is unlawful and the individual opposes erasure and requests restriction instead; and
 - where Star no longer needs the personal data, but the individual requires the data to establish, exercise or defend a legal claim.
79. If the personal data in question has been disclosed to third parties, Star will inform them about the restriction on the processing of the personal data, unless it is impossible or involves disproportionate effort to do so.
80. Star Academies will inform individuals when a restriction on processing has been lifted.

The right to data portability

81. Individuals have the right to obtain and reuse their personal data for their own purposes across different services.
82. 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.
83. The right to data portability only applies in the following cases:
 - to personal data that an individual has provided to a controller; and
 - where the processing is based on the individual's consent or for the performance of a contract; and
 - when processing is carried out by automated means.
84. Personal data will be provided in a structured, commonly used and machine-readable form.
85. Star Academies will provide the information free of charge.
86. Where feasible, data will be transmitted directly to another organisation at the request of the individual.
87. Star Academies is not required to adopt or maintain processing systems which are technically compatible with other organisations.
88. In the event that the personal data concerns more than one individual, Star Academies will consider whether providing the information would prejudice the rights of any other individual.
89. Star Academies will respond to any requests for portability within one month.
90. 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.
91. Where no action is being taken in response to a request, Star Academies 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 ICO and to a judicial remedy.



The right to object

92. Star Academies 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.
93. 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; or
 - processing for purposes of scientific or historical research and statistics.
94. 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; and
 - Star Academies will stop processing the individual's personal data unless the processing is for the establishment, exercise or defence of legal claims, or, where Star Academies can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual.
95. Where personal data is processed for direct marketing purposes:
 - Star Academies will stop processing personal data for direct marketing purposes as soon as an objection is received.
 - Star Academies cannot refuse an individual's objection regarding data that is being processed for direct marketing purposes.
96. 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, Star Academies is not required to comply with an objection to the processing of the data.
97. Where the processing activity outlined above is carried out online, Star Academies will offer a method for individuals to object online.

Automated decision making and profiling

98. Individuals have the right not to be subject to a decision when:
 - it is based on automated processing, e.g. profiling; and
 - it produces a legal effect or a similarly significant effect on the individual.
99. Star Academies 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.
100. When automatically processing personal data for profiling purposes, Star Academies 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; and
- securing personal data in a way that is proportionate to the risk to the interests and rights of the individual and prevents discriminatory effects.

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

- Star Academies has the explicit consent of the individual;
- the processing is necessary for reasons of substantial public interest.

Privacy by design and privacy impact assessments

102. Star Academies will adopt a privacy by design approach and implement technical and organisational measures that demonstrate how Star Academies, and its establishments, have considered and integrated data protection into processing activities.

103. **Data Protection Impact Assessments (DPIAs)** will be used to identify the most effective method of complying with Star Academies data protection obligations and meeting individuals' expectations of privacy when new requirements with regards to data processing are identified.

104. **DPIAs** will allow Star Academies, and its establishments, to identify and resolve problems at an early stage. This will reduce associated costs, prevent risks to a Data Subjects rights or damage to the reputation of Star Academies.

105. 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.

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

107. 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; and
- the use of CCTV.

108. Star Academies have a template **DPIA** that will be used by its establishments to ensure all required information is included and considered correctly.

109. Where a **DPIA** indicates high risk data processing, the matter will be referred to the DPO who may consult the ICO in order to seek its opinion as to whether the processing operation complies with data protection laws.

110. Information within the DPIA will assist the completion of the **Record of Processing**.

Data breaches

111. 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.

112. The Star Academies DPO, liaising with Data Protection Leads at its establishments, will ensure that all staff are made aware of, and understand, what constitutes a data breach as part of their data protection training.

113. All data breaches must be notified immediately to the DPO.



114. A **Breach Reporting Form** should be used to enable the DPO to have access to all relevant information. However, where all information required is not yet known, this should not delay notification to the DPO. Initial notification may occur whilst further information is gathered by the establishment.
115. Following receipt of the **Breach Reporting Form** the DPO will complete a **Breach Risk Assessment Form**, to assist in the decision making regarding whether the matter is required to be reported to the ICO.
116. Where a breach is likely to result in a risk to the rights and freedoms of individuals, the ICO will be notified.
117. 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.
118. All ICO notifiable breaches must, by law, be referred to ICO within 72 hours of Star Academies becoming aware of the breach.
119. In the event that a breach is likely to result in a high risk to the rights and freedoms of an individual, Star Academies will notify those concerned directly.
120. A 'high risk' breach means that the threshold for notifying the individual is higher than that for notifying the relevant supervisory authority.
121. In the event that a breach is sufficiently serious, Star Academies will notify the public without undue delay.
122. Effective and robust breach detection, investigation and internal reporting procedures are required within all Star Academies establishments.
123. Star Academies will maintain a **Log of Data Protection Breaches**.
124. Failure to report a notifiable breach to ICO without the statutory timescale may result in a fine, as well as a fine for the breach itself.

Security

125. Star Academies will ensure that appropriate security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. Data subjects may apply to the courts for compensation if they have suffered damage from such a loss.
126. Star Academies and its establishments will have in place appropriate procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.
127. In line with Star Academies **Privacy Notices**, we will not share information with third parties without consent unless the law allows us to do so.
128. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures, in line with the data protection laws, an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.
129. Personal data will only be transferred to a third-party data processor if that party agrees to comply with Star Academies' policies and procedures on data transfer, including electronic data transfer.
130. Third parties with whom we contract, who will be able to access data as part of that contract, will have to undergo a due diligence check as part of our procurement process. Third parties who



do not meet acceptable standards of data security will not be contracted with. If Star Academies becomes aware of any data security concerns regarding a third party with whom we contract, we will reserve the right to terminate the contract.

131. Third parties are only able to access Star Academies ICT systems if they have accepted that they will comply with our ***ICT security policies and procedures***.

132. Maintaining data security means guaranteeing the confidentiality, integrity and availability of the personal data, defined as follows:

- *confidentiality* - only people who are authorised to use the data can access it;
- *integrity* - personal data should be accurate and suitable for the purpose for which it is processed; and
- *availability* - authorised users should be able to access the data if they need it for authorised purposes.

133. Security procedures include the following:

- entry controls are in place and any strangers within entry-controlled areas are reported;
- Confidential paper records are kept in locked drawers and cupboards, with restricted access (personal data is always considered confidential);
- Confidential paper records will not be left unattended or in clear view anywhere with general access;
- Data users should ensure their PC monitors do not show confidential information to passers-by and that they lock or log off from their PC when it is left unattended;
- Electronic personal data must be coded, encrypted or password-protected;
- Personal data must be stored on the Star Academies network and not individual PCs or other devices;
- The Star Academies network drive is regularly backed up off-site;
- Where data is required to be saved on removable storage or a portable device, the device will be kept in a locked filing cabinet, drawer or safe when not in use;
- Memory sticks will not be used to hold personal information unless they are password-protected and fully encrypted;
- Electronic devices must be encrypted or password protected and, where possible also enabled to allow the remote blocking or deletion to protect data in case of theft;
- Staff and Governors will not store personal data on their personal devices;
- Staff are provided with a secure login and are required to regularly update their password;
- Emails containing sensitive or confidential information must be password-protected if there are unsecure servers between the sender and recipient;
- Circular emails that contain non- Star email addresses must be sent blind carbon copy (bcc) to prevent the disclosure of email addresses to other recipients;
- When sending confidential information by fax, staff must always check that the recipient is present at the receiving machine before sending;
- Where personal information that could be considered private or confidential is taken off the premises, either in electronic or paper format, staff must take the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the premises accepts full responsibility for the security of the data.

134. Before sharing data, all staff will ensure:

- They are allowed to share it;
- That adequate security is in place to protect it; and



- That who will receive the data has been outlined in a **Privacy Notice**.
135. Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of Star establishments containing sensitive information are supervised at all times.
136. The physical security of the establishment's 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 ensure secure data storage will be put in place.
137. Star's Head of ICT is responsible for ensuring continuity and recovery measures are in place to provide for the security of protected data
138. Star Academies establishments shall ensure that **ICT security policies and procedures** are implemented.

Providing information over the telephone

139. Star staff dealing with telephone enquiries should take specific precautions to prevent the unlawful disclosure of personal data. In particular they should:
- verify the caller's identity to ensure information is only given to those legally entitled;
 - ensure that any request that falls within the definition of a **SAR** follows the correct procedure and is put into writing; and
 - refer to the DPO or the establishment Senior Leadership Team for assistance in difficult situations - no-one should be bullied into disclosing personal information.

Publication of information

140. Star Academies has a **Publication Scheme** on its websites outlining classes of information that are made routinely available. This includes policies, annual reports and financial information.
141. Classes of information specified on the publication scheme are made available upon request.
142. When uploading information to the Star Academies and establishment websites, staff are considerate of any metadata or deletions which could be accessed in documents and images on the site.

Images: photography and videos

143. Star Academies understands that recording images of identifiable individuals constitutes processing personal data and should be done in line with data protection principles.
144. Star Academies, and its establishments, notifies all pupils, staff and visitors of the purpose for collecting CCTV images via signage.
145. CCTV cameras are only placed where they do not intrude on anyone's privacy and are necessary to fulfil their purpose.
146. CCTV is operated in line with the Star Academies **CCTV Policy**.
147. Star Academies and its establishments will indicate its intentions for taking photographs and/or videos of pupils and will verify permission before publishing them. Consent is sought within the **Photography and Videos Consent Form**.
148. Under data protection law, photographic images and videos may be kept for archiving purposes, in the public interest and historical research. However, they will not be published within general



marketing publications or the website for a period longer than 3 years after the pupil has left a Star Academies establishment.

149. Where photographic images and/ or video is sought for use in a publication not covered within the existing ***Photography and Videos Consent Form***, the ***Photography and Videos Specific Consent Form*** will be used.
150. Images captured by individuals on our premises for recreational/personal purposes, made by parents/carers for family use, are exempt from data protection law.
151. Star Academies provides further advice within their ***Photography and Video Recording Guidance*** document.

Data retention

152. Data will not be kept for longer than is necessary.
153. Unrequired data will be deleted as soon as practicable.
154. Personal Data is retained and destroyed in line with the Star Academies ***Records Management Policy***.
155. It should be noted that some records relating to former pupils or employees of the school may be kept for an extended period for legal reasons, and to enable the provision of references or academic transcripts.
156. Paper and electronic documents/memories are erased or securely destroyed once the data is no longer to be retained.

Disclosure and Barring Service (DBS) data

157. All DBS data will be handled in line with data protection legislation.
158. 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.

Monitoring, evaluation and review

159. The policy will be promoted and implemented throughout all Trust establishments.
160. The Trust will monitor the operation and effectiveness of arrangements referred to in this policy at each of its establishments.
161. The Trust will review this policy to ensure its continued compliance with legal requirements.