

Mary Pugsley MBE

Director, Hair@theAcademy



Data Protection Policy

Written by Mary Pugsley MBE

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Hair@theAcademy is a company limited by guarantee, registered in England and Wales, number 9223155.

Registered office: 8 Feltrim Avenue Exeter Devon EX24RP UKPKN 10047420

1. **Aims** Hair@theAcademy Trust aims to ensure that all personal data collected about staff, pupils, parents, governors, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Policy 2 Data Protection Regulation (GDPR) and the expected provisions of the Data Protection Act 2018 (DPA 2018) as set out in the Data Protection Bill. This policy applies to all personal data, regardless of whether it is in paper or electronic format.

2. **Legislation and guidance** This policy meets the requirements of the GDPR and the expected provisions of the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the GDPR and the ICO's code of practice for subject access requests. It meets the requirements of the Protection of Freedoms Act 2012 when referring to our use of biometric data. It also reflects the ICO's code of practice for the use of surveillance cameras and personal information. In addition, this policy complies with our funding agreement and articles of association.

3. **Definitions** Term Definition Personal data Any information relating to an identified, or identifiable, individual. This may include the individual's:

- Name (including initials)
- Identification number
- Location data
- Online identifier, such as a username It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity. Special categories of personal data Personal data which is more sensitive and so needs more protection, including information about an individual's:
 - Racial or ethnic origin
 - Political opinions
 - Religious or philosophical beliefs Genetics
 - Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes
 - Health – physical or mental
 - Sex life or sexual orientation Processing Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying. Processing can be automated or manual. Data subject The identified or identifiable individual whose personal data is held or processed.

3 Data controller A person or organisation that determines the purposes and the means of processing of personal data. Data processor A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller. Personal data

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breach A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

4. The data controller for Hair@theAcademy processes personal data relating to parents, pupils, staff, governors, visitors and others, and therefore is a data controller. The Trust and member academies are registered as a data controller with the ICO and will renew this registration annually or as otherwise legally required.

5. Roles and responsibilities This policy applies to all at Hair@theAcademy , and to external organisations or individuals working on our behalf. Staff who do not comply with this policy may face disciplinary action.

5.1 Data protection officer The data protection officer (DPO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable.

5.4 All staff are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy

6. Parental requests to see the educational record Please contact the Director in the first instance.

7. CCTV Hair@theAcademy Trust uses CCTV in various locations around the school sites to ensure it remains safe. We will adhere to the ICO's code of practice for the use of CCTV. 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. Any enquiries about the CCTV system should be directed to the DPO

8. Photographs and videos as part of our daily activities, we may take photographs and record images of individuals within Hair@theAcademy We will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil. Uses may include:

- Within Hair@theAcademy on notice boards and in magazines, brochures, newsletters, etc.
- Outside of school by external agencies such as the photographer, newspapers, campaigns
- Online on our website or social media pages Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further. When

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using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.

9 See our child protection and safeguarding policy for more information on our use of photographs and videos.

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