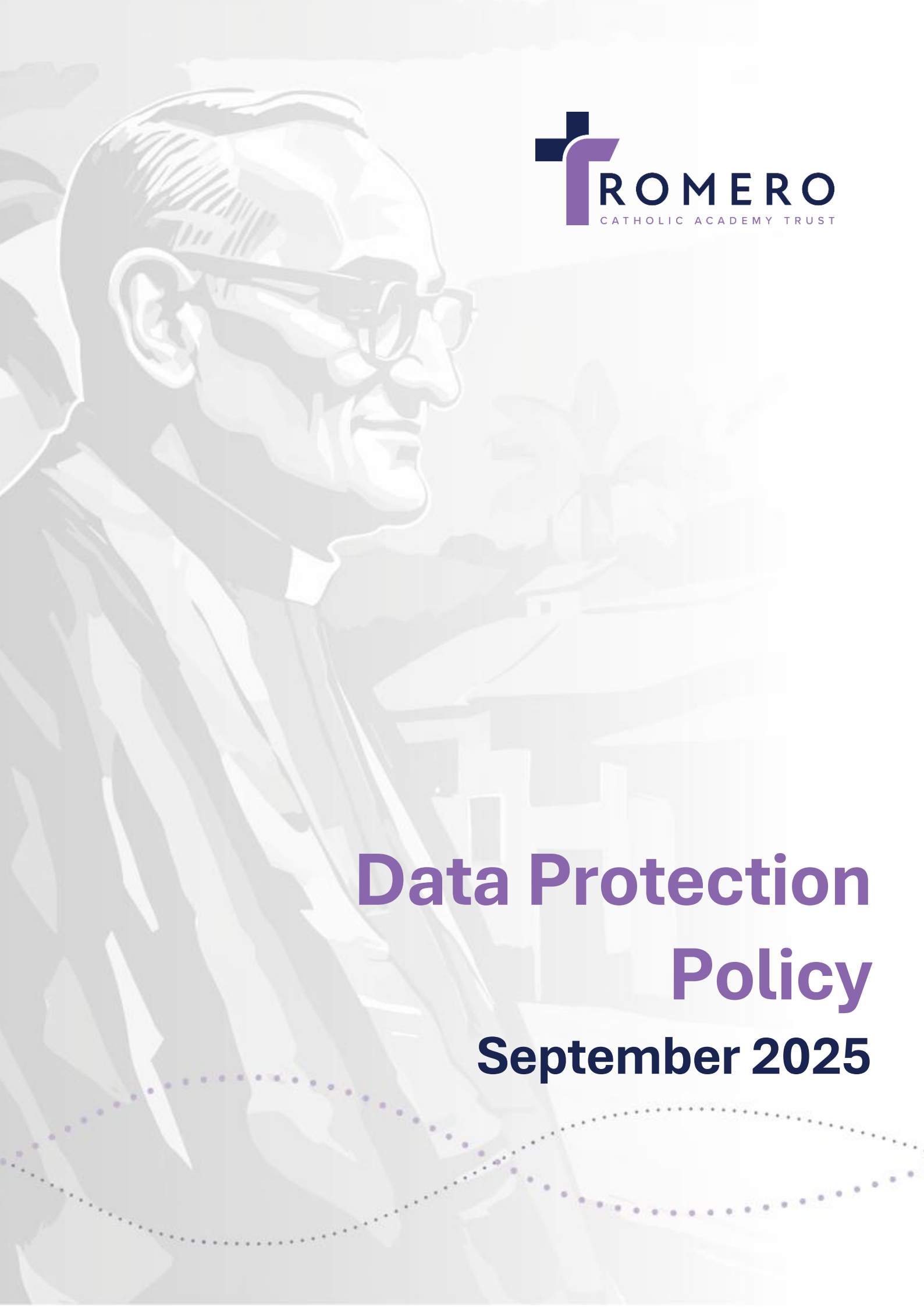

ROMERO
CATHOLIC ACADEMY TRUST

Data Protection Policy

September 2025

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CONTENTS

INTRODUCTION

1. This is the Data Protection Policy of Romero Catholic Academy Trust

2. We are committed to processing Personal Information fairly and lawfully in accordance with the UK General Data Protection Regulation (the retained EU law version of the General Data Protection Regulation (EU) 2016/679) ("GDPR"), the Data Protection Act 2018 ("the DPA") and other related legislation which protects Personal Information. It is necessary for the Trust to process Personal Information about its staff, pupils, parent(s) / guardian(s) and other individuals who it may come into contact with. In doing so, we recognise that the correct and lawful treatment of Personal Information is critical to maintaining the confidence of those connected with the Trust.

3. This Policy, and any other documents referred to in it, sets out our approach to ensuring that we comply with data protection laws. It takes account of the important requirements of the GDPR and DPA.

4. This Policy applies to the Trust and its schools. Staff will be required to confirm that they have read and understood the Policy. All employees must comply with our policies and procedures relating to data protection. This Policy does not form part of any employee's contract of employment and may be amended at any time.

5. The Policy will be reviewed and updated in accordance with documented review dates, though the Trust reserves the right to update this policy at any time where it is more immediately necessary to do so e.g. because of operational changes, court or regulatory decisions, or changes in regulatory guidance.

DEFINITION OF DATA PROTECTION TERMS

6. We have set out below some of the terms used in this Policy along with a brief explanation about what they mean.

    6.1. Data Subjects means an identified or identifiable natural person. For example, we process personal information about parents, staff members and pupils each of whom is a data subject.

    6.2. Personal Information means any information about a data subject. Examples of personal information could include information about a pupil's attendance, medical conditions, special educational needs requirements or photographs.

    6.3. Privacy Notices are documents provided to data subjects which explain, in simple language, what information we collect about them, why we collect it and why it is lawful to do so. They also provide other important information which we are required to provide under data protection laws. Our privacy notices are available on our website and from the Trust upon request.

    6.4. Data Controllers determine the purpose and means of processing personal information. They are responsible for establishing practices and policies in line with the GDPR. The Trust is a Data Controller.

6.5. Processing means when personal information is used in a particular way. For example, we may need to collect, record, organise, structure, store, adapt or delete personal information. When we do this, we will be Processing.

6.6. Special Category of Personal Information means data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, health data, data concerning a data subject's sex life or sexual orientation. These types of personal information are regarded as being more 'sensitive' and the law requires increased safeguards to be in place if we are to process this type of data.

DATA PROTECTION PRINCIPLES

7. When we Process Personal Information, we will do so in accordance with the 'Data Protection Principles'. In this regard, we will ensure that Personal Information is:-

    7.1.1. Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency).

    7.1.2. Collected only for specified, explicit and legitimate purposes (Purpose Limitation).

    7.1.3. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation).

    7.1.4. Accurate and where necessary kept up to date (Accuracy).

    7.1.5. Not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation).

    7.1.6. Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality).

8. We recognise that not only must we comply with the data protection principles, we must also demonstrate our compliance with these principles (Accountability).

LEADERSHIP AND OVERSIGHT

9. The Trust Board has overall responsibility for data protection and information governance. Decision-makers are expected to lead by example and promote a proactive, positive data protection culture.

10. Each Trust school will have a nominated data protection lead at a local school level to ensure that a strong data protection culture is established across all Trust schools.

THE DATA PROTECTION OFFICER (DPO)

11. The GDPR requires certain organisations, including the Trust, to appoint a 'Data Protection Officer' ("DPO"). The DPO must have expert knowledge in data protection law and practices. Our appointed

DPO who fulfils these requirements is HY Education, who can be contacted by telephone on 0161 543 8884 or email at DPO@wearehy.com

12. The DPO is independent of the Trust to avoid any conflict of interest and will be given the authority, support and resources necessary to undertake the role effectively. The DPO reports to the most senior level of management. The DPO will be involved in data protection matters in a timely manner, and the Trust will have proper regard to all advice given.

ACCOUNTABILITY

13. As a Data Controller, we are responsible for, and must be able to demonstrate, compliance with the data protection principles. We will meet this requirement by working to an accountability framework which will allow us to embed our data protection arrangements across the Trust.

POLICIES AND PROCEDURES

14. The Trust will implement a clear policy and procedure framework which provides staff with sufficient direction to understand their roles and responsibilities regarding data protection and information governance. Our policy and procedure framework will stem from strategic planning so that it supports the Trust's objective of creating a strong data protection culture.

TRAINING AND AWARENESS

15. The Trust will ensure that its staff receive appropriate training which stems from a proper consideration of what will be most effective. This will include a range of resources including the DPO's HYin5ive data protection series which provides sector specific content. The Trust will be responsible for keeping training provision under review and seek advice from the DPO were required.

16. All staff are required to undertake training as part of the induction process within 1 month of their start date. Existing staff will be required to undertake refresher training once every two years unless directed otherwise. Records will be maintained to evidence that staff have received training in accordance with the Policy.

17. Staff are encouraged to share any feedback or ideas which they feel will enhance training provision across the Trust. Staff can provide this feedback by emailing: lauren.lang@romerocat.com

LAWFULNESS, FAIRNESS, TRANSPARENCY

LAWFUL PROCESSING

18. Personal Information must be Processed lawfully. Under data protection laws, there are a number of grounds which make it lawful to Process Personal Information. We will only Process Personal Information if one or more of the following apply:-

18.1. the Data Subject has given his or her consent.

18.2. the Processing is necessary for the performance of a contract with the Data Subject.

18.3. the Processing is necessary to meet our legal obligations.

18.4. the Processing is necessary to protect the Data Subject's vital interests.

18.5. the Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority (often referred to as Public Task).

19. We recognise that some categories of Personal Information are more sensitive and further conditions must be satisfied if we are to Process this information (Special Category and criminal conviction data). Where we Process these categories of Personal Information, we will ensure that we do so in accordance with the additional conditions for Processing set out under the GDPR and the DPA.

TRANSPARENT PROCESSING

20. We will provide appropriate privacy information to those who we process Personal Information about such as pupils, parents / carers and staff. We will provide this information in the form of a Privacy Notice, which will contain all of the necessary information required under data protection laws.

21. We will provide privacy information in a way which is effective. This means that we will proactively publish privacy information in a way which is free and easy to access. In this regard, privacy information will be made available both on our website and be available in hard copy on request. We will ensure that privacy information is set out in a way which is clear and in plain language so that that this can be easily understood.

22. We will provide privacy information in a timely manner, so that it is always available to those who we process Personal Information about.

RECORD OF PROCESSING ACTIVITIES (ROPA) AND LAWFUL BIAS FOR PROCESSING

23. The Trust will undertake information audits to ensure that it has an accurate understanding of data flows. This information will be recorded in the Trust's Article 30 Record of Processing Activities (ROPA) which will always be maintained in electronic format.

24. The ROPA will include, as a minimum, all relevant requirements of the GDPR and the legal basis upon which the Trust relies to process Personal Information.

25. The ROPA will be reviewed and updated at reasonable intervals.

CONSENT

26. Where it is necessary for us to obtain consent to process Personal Information, we will ensure that we do so in accordance with data protection laws. Generally, we will only obtain consent where there is no other lawful basis for Processing. An example of when we will obtain consent is if we want to place a photograph of a pupil in the newspaper, on social media or in other publications to celebrate their achievements.

27. We recognise that under data protection laws, there are stricter rules as to how consent is obtained. We will ensure that when we obtain consent, we will:-

27.1. take steps to ensure that we make it clear to Data Subjects what they are being asked to consent to;

27.2. ensure that the Data Subject, either by a statement or positive action,gives their consent. We will never assume that consent has been given simply because a Data Subject has not responded to a request for consent;

27.3. never use pre-ticked boxes as a means of obtaining consent;

27.4. ensure that a Data Subject is informed that they can withdraw their consent at any time and the means of doing so;

27.5. keep appropriate records evidencing the consents we hold.

DATA PROTECTION IMPACT ASSESSMENTS

28. We will carry out a DPIA in respect of high-risk processing. We may also carry out DPIAs even where they are not strictly required, but will nonetheless assist us to demonstrate high standards of data protection compliance.

CHILDREN'S DATA

29. Recital 38 of the UK GDPR states that children merit specific protection with regard to their personal data as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of personal data.

29.1. Where a processing activity requires the consent of a child, we will first consider whether they are able to understand the implications of the processing. If the child is considered to be capable, then they will be considered competent to give their own consent to the processing, unless it is evident that they are acting against their own bests interests. Where the child is not capable, then we will obtain consent from someone with parental responsibility, unless it is evident that it would be against the best interests of the child to seek such consent.

29.2. Children have the same rights as adults over their personal data, such as the right to make a subject access request. Children can exercise these rights on their own behalf where they are competent to do so (see above).

29.3. In some circumstances where a person with parental responsibility exercises rights on behalf of a child, it may be appropriate to seek the child's consent before complying with a request. For example, a child with sufficient capability can object to their personal information being disclosed to another person. The Trust will assess this on a case by case basis.

RETENTION

30. We will not keep Personal Information for longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy and erase from our systems all data which is no longer required.

31. We will establish a records management procedure to assist the Trust in discharging its retention obligations.

INDUVIDUAL RIGHTS

32. We will Process all Personal Information in line with a Data Subject's rights, in particular, their right to:

    32.1. Request access to any personal information held about them by the Trust.

    32.2. Rectification of inaccurate information.

    32.3. Erasure of Personal Information.

    32.4. Restrict the Processing of Personal Information.

    32.5. Object to the Processing of Personal Information.

33. We will maintain a clear procedure detailing how such requests will be handled.

DATA SECURITY

34. We will implement appropriate technical and organisational measures to guard against unauthorised or unlawful Processing, and against accidental loss, destruction or damage.

35. We will develop, implement and maintain safeguards appropriate to our size, scope, our available resources and the level of risk identified.

DATA BREACHES

36. All data breaches will be handled in accordance with the Trust's internal breach reporting procedure.

CHANGES TO THIS POLICY

37. We reserve the right to change this policy at any time and notification of any changes will be communicated accordingly.