

# United Learning Security of Personal Data Policy

## Scope

The policy set out in this document applies to all United Church Schools Trust (UCST) and United Learning Trust (ULT) schools and offices. The two companies (UCST and ULT) and its subsidiaries are referred to in this policy by their trading name, 'United Learning'.

Where this policy refers to 'School' or 'Head Teacher', within Central Office this should be interpreted to refer to the department where a member of staff works and their Head of Department.

As a values-led organisation our values of ambition, confidence, creativity, respect, enthusiasm and determination are key to our purpose and underpin all that we do.

## Definitions

**"Personal data"** means any information relating to an identified or identifiable natural person ("data subject");

an **"identifiable 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, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

**"Processing"** means any operation or set of operations performed upon personal data or sets of personal data, whether or not by automated means, 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.

## Policy Statement

United Learning values the personal information entrusted to us and has in place technical and organisational measures that ensure a level of security appropriate to the sensitive nature of the personal data that we process. In particular we will:

- Consider and regularly review the potential risks to individuals from our processing of their personal data, in particular from accidental or unlawful destruction, loss, alteration, unauthorised access to or disclosure of the personal data.
- Ensure that systems containing personal data are encrypted.
- Use pseudonymisation of personal data when practical to do so.
- Ensure the ongoing confidentiality, integrity, availability and resilience of our processing systems
- Have in place a procedure to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- Regularly test, assess and evaluate the effectiveness of our technical and organisational measures for ensuring the security of the processing.



- Put in place processes and training to ensure that employees and contractors only process personal data as instructed by United Learning.

## Policies and Procedures

Both Schools and Central Office will implement the following policies and procedures, which have been approved by the Finance and Infrastructure Committee and are the minimum standards required.

- Technology Handbook which includes:
  - Information security policy
  - Acceptable usage policy
  - Procedure for the secure transfer of files
  - Bring your own device to work policy
  - Procedure for notification of a personal data breach
- Data sharing policy and procedure
- Data Protection Impact assessment policy, procedure and guidance.

Each school and central office will put in place a process for ensuring the effectiveness of organisational and technical security measures.

Each school will nominate an individual of sufficient seniority who will be responsible for ensuring that these policies and procedures are implemented and adhered to. All staff must receive data protection training appropriate to their role. Each school will keep records to demonstrate compliance with these policies and procedures.

Central office staff will, from time to time, conduct audits to ensure compliance.

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