



Inspire Education Trust

Together we achieve, individually we grow

Data Protection Policy

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Document History

Version	Status		Date	Author	Summary Changes
V1			Mar 19	Jessica Sweet	
V2			Oct 2021	Paul Hewitt	Standardise school / Trust policies, apply new branding. Annex 2 added.
V3			Sept 2023	Martin Dorrington	Updated section 4 with details of new DPO. Expanded section 4 to cover staff roles and responsibilities. Added information regarding staff training.
V4	DRAFT		September 2026	Martin Dorrington	Added information relating to Data Use and Access Act 2025. Modified some DPO references to DPL Clarification around explicit consent Added Data Protection Complaints section Various minor changes.

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1. Policy statement

- 1.1 Inspire Education Trust is committed to promoting and achieving equality of opportunity for all students, parents, staff, governors, visitors and job applicants.
- 1.2 Inspire Education Trust recognises the importance of maintaining public trust through lawful, transparent and secure handling of personal information.
- 1.3 Everyone has rights with regard to the way in which their **personal data** is handled. During the course of our activities as Inspire Education Trust we will collect, store and **process personal data** about our pupils, **workforce**, parents and others. This makes us a **data controller** in relation to that **personal data**.
- 1.4 We are committed to the protection of all **personal data** and **special category personal data** for which we are the **data controller**.
- 1.5 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.
- 1.6 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. About this policy

- 2.1 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 ('UK GDPR'), the Data Protection Act 2018, the Data Use and Access Act 2025 and other regulations (together '**Data Protection Legislation**').
- 2.2 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.
- 2.3 This policy does not form part of any employee's contract of employment and may be amended at any time.
- 2.4 This policy sets out rules on data protection and the legal conditions that must be satisfied when we process **personal data**.

3. Definition of data protection terms

- 3.1 All defined terms in this policy are indicated in **bold** text, and a list of definitions is included in the Annex to this policy.

4. Staff roles & responsibilities

- 4.1 The Board of Directors have overall responsibility for ensuring that Inspire Education Trust complies with all relevant data protection obligations.
- 4.2 As Inspire Education Trust we are required to appoint a Data Protection Officer ("DPO").

Our DPO is Warwickshire County Council DPO Service and they can be contacted in writing at School DPO Service, Warwickshire Legal Services, Warwickshire County Council, Shire Hall, Warwick, CV34 4RL or via schoolDPO@warwickshire.gov.uk.

- 4.3 The DPO is responsible for ensuring compliance with the Data Protection Legislation and with this policy.

The DPO is also the first point of contact for **data subjects** whose **data** the school **processes**, and for the ICO.

- 4.4 The headteacher acts as the representative of the **data controller** (Inspire Education Trust) on a day-to-day basis.

- 4.5 Inspire Education Trust has nominated a Data Protection Lead ("DPL") as a designated person to be contacted internally in relation to all matters relating to data protection issues, and to make referrals, where necessary, to the Data Protection Officer. They can be contacted via dpl@ietrust.org.

- 4.6 All members of our **workforce** are responsible for:

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

- 4.6.2 Informing the school of any changes to their **personal data**, such as a change of address; and

- 4.6.3 Contacting the designated Data Protection Lead in the following circumstances:

- 4.6.3.1 With any questions about the operation of this policy, data protection law, retaining **personal data** or keeping **personal data** secure;

- 4.6.3.2 If they have any concerns that this policy is not being followed;

- 4.6.3.3 If they are unsure whether or not they have a lawful basis to use **personal data** in a particular way;

- 4.6.3.4 If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer **personal data** outside the European Economic Area;

- 4.6.3.5 If there has been a **data** breach;

- 4.6.3.6 Whenever they are engaging in a new activity that may affect the privacy rights of individuals; and

- 4.6.3.7 If they need help with any contracts or sharing personal data with third parties.

4.7 All staff and governors are provided with data protection training as part of their induction process. Data protection will also form part of continuing professional development, where changes to legislation, guidance or the school's processes make it necessary.

5. Data protection principles

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

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

5.1.2 **Processed** for specified, lawful purposes and in a way which is compatible with those purposes;

5.1.3 Adequate, relevant and not excessive for the purpose;

5.1.4 Accurate and up to date;

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

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

5.2 **Personal Data** must also:

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

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

5.3 We will comply with these principles in relation to any **processing** of **personal data** by Inspire Education Trust.

6 Fair and lawful processing

6.1 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**.

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

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

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

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

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

- 6.2.5 the period for which the **personal data** will be held;
 - 6.2.6 the existence of the **data subject's** rights in relation to the **processing** of that **personal data**; and
 - 6.2.7 the right of the **data subject** to raise a complaint with the Information Commissioner's Office in relation to any **processing**.
- 6.3 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**.
- 6.4 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:
- 6.4.1 where the **processing** is necessary for the performance of a contract between us and the **data subject**, such as an employment contract;
 - 6.4.2 where the **processing** is necessary to comply with a legal obligation that we are subject to, (e.g. the Education Act 2011);
 - 6.4.3 where the law otherwise allows us to **process** the **personal data** or we are carrying out a task in the public interest;
 - 6.4.4 where there is a recognised legitimate interest to share the data with, or receive the data from, another data controller; or
 - 6.4.5 where none of the above apply then we will seek the consent of the **data subject** to the **processing** of their **personal data**.
- 6.5 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:
- 6.5.1 where the **processing** is necessary for employment law purposes, for example in relation to sickness absence;
 - 6.5.2 where the **processing** is necessary for reasons of substantial public interest, for example for the purposes of equality of opportunity and treatment;
 - 6.5.3 where the **processing** is necessary for health or social care purposes, for example in relation to pupils with medical conditions or disabilities; and
 - 6.5.4 where none of the above apply then we will seek the explicit consent of the **data subject** to the **processing** of their **special category personal data**.
- 6.6 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.

6.7 If any **data user** is in doubt as to whether they can use any **personal data** for any purpose, then they must contact the DPL or DPO before doing so.

6.8 The Trust recognises that safeguarding information may be processed and shared where necessary to protect children and fulfil statutory safeguarding duties.

Vital Interests

6.9 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.

Consent

6.10 Many educational activities are undertaken under public task or legal obligation and therefore do not require consent.

6.11 Where none of the other bases for **processing** set out above apply then the Trust must seek the consent of the **data subject** before **processing** any **personal data** for any purpose.

6.12 There are strict legal requirements in relation to the form of consent that must be obtained from **data subjects**.

6.13 When pupils and/or our **Workforce** join Inspire Education Trust a consent form will be required to be completed in relation to them. This consent form deals 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.

6.14 In relation to all pupils under the age of 13 years old we will seek consent from an individual with parental responsibility for that pupil.

6.15 We will generally seek consent directly from a pupil who has reached the age of 13, 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.

6.16 If consent is required for any other **processing** of **personal data** of any **data subject**, then the form of this consent must:

6.16.1 Inform the data subject of exactly what we intend to do with their personal data, including details of the subject matter, duration of processing, nature and purpose of data processing and the categories of personal data involved;

- 6.16.2 Require them to positively confirm that they consent – we cannot ask them to opt-out rather than opt-in;
- 6.16.3 If any **special category personal data** will be shared, explicitly name which items this will be and require them to positively confirm they consent to this **special category personal data** being shared as well; and
- 6.16.4 Inform the **data subject** of how they can withdraw their consent.
- 6.17 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.
- 6.18 The DPO or DPL must always be consulted in relation to any consent form before consent is obtained.
- 6.19 A record must always be kept of any consent, including how it was obtained and when.

7 Processing for limited purposes

- 7.1 In the course of our activities as Inspire Education Trust, we may collect and **process** the **personal data** set out in our Record 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**).
- 7.2 We will only **process personal data** for the specific purposes set out in our Record 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.

8 Notifying data subjects

- 8.1 If we collect **personal data** directly from **data subjects**, we will inform them about:
 - 8.1.1 our identity and contact details as **Data Controller** and those of the DPO;
 - 8.1.2 the purpose or purposes and legal basis for which we intend to **process** that **personal data**;
 - 8.1.3 the types of third parties, if any, with which we will share or to which we will disclose that **personal data**;
 - 8.1.4 whether the **personal data** will be transferred outside the European Economic Area ('EEA') and if so the safeguards in place;
 - 8.1.5 the period for which their **personal data** will be stored, by reference to our Retention and Destruction Policy;
 - 8.1.6 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

8.1.7 the rights of the **data subject** to object to or limit processing, request information, request deletion of information or lodge a complaint with the ICO.

8.2 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.

8.3 Current privacy notices are published on the Trust website and school websites.

9 Adequate, relevant and non-excessive processing

9.1 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.

10 Accurate data

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

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

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

11 Timely processing

11.1 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.

12 Processing in line with data subject's rights

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

12.1.1 request access to any **personal data** we hold about them;

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

12.1.3 have inaccurate or incomplete **personal data** about them rectified;

12.1.4 restrict **processing** of their **personal data**;

12.1.5 have **personal data** we hold about them erased;

12.1.6 have their **personal data** transferred; and

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

The Right of Access to Personal Data

- 12.2 **Data subjects** may request access to all **personal data** we hold about them. Such requests will be considered in line with the Trust's Subject Access Request Policy.

The Right to Object

- 12.3 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.
- 12.4 An objection to **processing** does not have to be complied with where the Trust can demonstrate compelling legitimate grounds which override the rights of the **data subject**.
- 12.5 Such considerations are complex and must always be referred to the DPO upon receipt of the request to exercise this right.
- 12.6 In respect of direct marketing any objection to **processing** must be complied with.
- 12.7 Inspire Education Trust is not however obliged to comply with a request where the **personal data** is required in relation to any claim or legal proceedings.

The Right to Rectification

- 12.8 If a **data subject** informs Inspire Education Trust that **personal data** held about them by Inspire Education Trust is inaccurate or incomplete, then we will consider that request and provide a response within one month.
- 12.9 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.
- 12.10 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.

The Right to Restrict Processing

- 12.11 **Data subjects** have a right to "block" or suppress the **processing** of **personal data**. This means that Inspire Education Trust can continue to hold the **personal data** but not do anything else with it.
- 12.12 Inspire Education Trust must restrict the **processing** of **personal data**:
- 12.12.1 Where it is in the process of considering a request for **personal data** to be rectified (see above);

- 12.12.2 Where Inspire Education Trust is in the process of considering an objection to processing by a **data subject**;
- 12.12.3 Where the **processing** is unlawful, but the **data subject** has asked Inspire Education Trust not to delete the **personal data**; and
- 12.12.4 Inspire Education Trust no longer needs the **personal data** but the **data subject** has asked Inspire Education Trust not to delete the **personal data** because they need it in relation to a legal claim, including any potential claim against Inspire Education Trust.
- 12.13 If Inspire Education 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.
- 12.14 The DPO must be consulted in relation to requests under this right.

The Right to Be Forgotten

- 12.15 **Data subjects** have a right to have **personal data** about them held by Inspire Education Trust erased only in the following circumstances:
- 12.15.1 Where the **personal data** is no longer necessary for the purpose for which it was originally collected;
- 12.15.2 When a **data subject** withdraws consent – which will apply only where Inspire Education Trust is relying on the individuals consent to the **processing** in the first place;
- 12.15.3 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;
- 12.15.4 Where the **processing** of the **personal data** is otherwise unlawful;
- 12.15.5 When it is necessary to erase the **personal data** to comply with a legal obligation; and
- 12.16 Inspire Education Trust is not required to comply with a request by a **data subject** to erase their **personal data** if the **processing** is taking place:
- 12.16.1 To exercise the right of freedom of expression or information;
- 12.16.2 To comply with a legal obligation for the performance of a task in the public interest or in accordance with the law;
- 12.16.3 For public health purposes in the public interest;

12.16.4 For archiving purposes in the public interest, research or statistical purposes; or

12.16.5 In relation to a legal claim.

12.17 If Inspire Education 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.

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

Right to Data Portability

12.19 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 another organisation.

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

13 Data Protection Complaints

13.1 Individuals have the ability to raise data protection complaints with Inspire Education Trust. This can be done via email or another communication method. Please refer to our Data Protection Complaints Policy.

14 Data security

14.1 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**.

14.2 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.

14.3 Security procedures include:

14.3.1 **Entry controls.** Any stranger seen in entry-controlled areas should be reported to Reception.

14.3.2 **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.)

14.3.3 **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.

14.3.4 **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.

14.3.5 **Working away from the school / Trust premises – paper documents.** Hard copy

documents containing personal data must not be taken off site unless strictly necessary for school / Trust business. The Trust recognises that legitimate school activities such as marking children's exercise books may take place off site at times. The member of staff concerned must take all necessary precautions to ensure that hard copy personal data is kept secure at all times, keeping it covered whilst in transit, and locked away in a secure place otherwise. No personal data may be kept offsite for longer than absolutely necessary for the school / Trust activity in progress. Staff must ensure that no data breaches occur, such as data being lost, stolen, or accessed by an unauthorised person such as a visitor or household member. When a staff member ceases employment with Inspire Education Trust, all paper documents containing personal data must be returned to school / Trust.

14.3.6 **Working away from the school / Trust premises – electronic working.** Staff are prohibited from all forms of transfer or processing of electronic personal data on any type of privately-owned device, including USB drives. Staff may work away from school / Trust premises using school / Trust issued equipment and a secure network connection method such as a Trust VPN if there has been prior authorisation from the Trust IT department, and after training has been provided. Files which do not contain personal data may be saved onto Trust owned, encrypted storage media, should the Trust issue such equipment for this purpose. Staff must only save personal data onto secure file locations which the Trust has authorised, such as Trust approved cloud services (e.g. OneDrive). Under no circumstances may staff email personal data to a private email account, or transfer or store data using a cloud service which the Trust IT department has not approved.

14.3.7 **Document printing.** Documents containing **personal data** must be collected immediately from printers and not left on photocopiers. Under no circumstances should staff give printer access codes or staff ID badges to pupils in order to collect printing.

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

15 Artificial Intelligence (AI) and Automated Systems

15.1 Inspire Education Trust recognises the increasing use of Artificial Intelligence (AI) and automated technologies within education and business operations.

15.2 The Trust will only use AI tools and systems that have been formally approved through Trust processes and which comply with applicable data protection, safeguarding, cyber security and information governance requirements.

15.3 Staff must exercise professional judgement when using AI and remain responsible for the accuracy, appropriateness and lawful use of any content, decisions or outputs generated.

- 15.4 **Personal data, special category personal data**, safeguarding information or any other confidential Trust information must not be entered into AI platforms or systems unless they have been approved by the Trust and appropriate contractual, security and data protection safeguards are in place.
- 15.5 Where the proposed use of AI or automated decision-making technologies involves or may involve the processing of **personal data**, a Data Protection Impact Assessment (DPIA) must be completed and approved prior to implementation.
- 15.6 The Trust will maintain appropriate oversight and governance arrangements for the use of AI, including regular review of risks, compliance, effectiveness and emerging regulatory requirements, to ensure that such technologies are used safely, ethically and in accordance with the Trust's legal and professional responsibilities.

16 Cyber Security

- 16.1 Inspire Education Trust will adopt proportionate cyber security controls based on DfE Cyber Security Standards for Schools and Colleges.
- 16.2 Aspects to mitigate and strengthen cyber security controls include:
 - 16.2.1 MFA (multi-factor authentication)
 - 16.2.2 Phishing awareness
 - 16.2.3 Password management
 - 16.2.4 Ransomware protection
 - 16.2.5 DfE Cyber Security Standards
- 16.3 Further detail is recorded in our Cyber Security Policy

17 Data Protection Impact Assessments

- 17.1 Inspire Education Trust takes data protection very 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.
- 17.2 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.
- 17.3 Inspire Education Trust will complete an assessment of any such proposed **processing** and has a template document which ensures that all relevant matters are considered.
- 17.4 The DPO should always be consulted as to whether a data protection impact assessment is required, and if so how to undertake that assessment.

18 Disclosure and sharing of personal information

- 18.1 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.
- 18.2 Inspire Education 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.
- 18.3 In some circumstances we will not share safeguarding information. Please refer to our Child Protection Policy
- 18.4 Further detail is provided in our Record of Processing Activities.

19 Data Processors

- 19.1 We contract with various organisations who provide services to Inspire Education Trust, including:
 - 19.1.1 Payroll providers, school meal providers, student support services, the local authority, IT service providers, exam boards and exam moderators, school trip providers, providers of medical services, school photographers, staff pension providers.
- 19.2 In order that these services can be provided effectively we are required to transfer **personal data** of **data subjects** to these **data processors**.
- 19.3 **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 Inspire Education Trust. Inspire Education Trust will always undertake due diligence of any **data processor** before transferring the **personal data** of **data subjects** to them.
- 19.4 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**.

20 Data Breaches Procedure

- 20.1 A personal data breach is a security incident that leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, **personal data**.
- 20.2 All staff, governors, trustees, volunteers, contractors and third parties working on behalf of the Trust have a duty to report any actual, suspected or potential personal data breach immediately upon becoming aware of it.
- 20.3 Reports must be made to the Trust's Data Protection Lead (DPL) without delay, regardless of whether the breach is believed to be minor or whether any harm has

occurred.

- 20.4 The DPL will take immediate steps to contain the incident, assess the nature and extent of the breach, maintain appropriate records and, where necessary, refer the matter to the Data Protection Officer (DPO) for formal assessment.
- 20.5 The DPO will advise whether the breach presents a risk to the rights and freedoms of individuals and whether notification to the Information Commissioner's Office (ICO) is required. The DPO may choose to notify the ICO themselves if they believe it is appropriate to do so.
- 20.6 Where the legal threshold is met, the Trust will notify the ICO without undue delay and, where feasible, within 72 hours of becoming aware of the breach. Where a breach is likely to result in a high risk to the rights and freedoms of affected individuals, the Trust will also notify those individuals without undue delay unless an exemption applies.
- 20.7 All breaches, whether reportable or not, will be recorded and reviewed to identify lessons learned, strengthen data protection controls, improve staff awareness and reduce the likelihood of recurrence.
- 20.8 Staff who fail to report a known or suspected breach may be subject to disciplinary action in accordance with Trust procedures
- 20.9 Further detail is recorded in our Data Breach Policy

21 Images and Videos

- 21.1 An announcement will be made at the start of school events to advise parents and other attendees whether photographs and videos are permitted at that event. Permission for parents and visitors to take photographs and videos may not be given for reasons including safeguarding, licensing and copyright.
- 21.2 Inspire Education 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.
- 21.3 As Inspire Education 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.
- 21.4 Whenever a pupil begins their attendance at Inspire Education 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. Where the school / Trust is relying upon consent, we will not use images or videos of pupils for any purpose where we do not have consent.

21.5 Further information regarding photographs and visual images is provided in Annex 2 of this document.

22 CCTV

22.1 Inspire Education trust operates CCTV at its schools. Please refer to the Trust CCTV policy.

23 Changes to this policy

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

ANNEX 1**DEFINITIONS**

Term	Definition
Data	is information which is stored electronically, on a computer, or in certain paper-based filing systems
Data Subjects	for the purpose of this policy include 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	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	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. Inspire Education Trust is a data controller.
Data Users	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	include any person or organisation that is not a data user that processes personal data on our behalf and on our instructions
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 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	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	Includes, any individual employed by the Academy Trust such as staff and those who volunteer in any capacity including Governors, Trustees, Members and parent helpers

ANNEX 2 Photographs and Visual Images

Background

In our MAT, we recognise photography as a useful tool, and it is used routinely in many ways. For example, for record keeping, for classroom displays, as part of teaching, and as an important part of children's own work and their learning. On occasions photographs are also used for the press, or for the school website, social media, to celebrate achievement and for other promotional purposes. We also recognise that parents may wish to take photographic images/and or record video images of their own children participating in school events. However, we are also sensitive to the wishes and rights of parents who may not want their children to be photographed, and/or who might have concerns about the possible future use of such images.

We are very aware of our responsibility to protect the children in our care from harm, and we will take every possible step to do so.

The taking of photographs in school is an increasingly complicated and sensitive area, because technology has now made it much easier for pictures and images to be used, shared or distributed inappropriately, both as printed material or as a digital image. Increased use of the Internet and social media has also presented new issues. It is therefore important that schools take practical steps to ensure that photography on school premises, or at school events, reflects the protective ethos of the school.

In order to ensure that, as far as possible, such photography complies with safeguarding requirements, the advice provided below should be followed. For clarity the following definitions are provided, and refer to this entire document:

Photographs / Photography refers to any photographic image, still or moving, captured by any photographic device, including mobile phones. This includes analogue and digital images, still and moving images including video footage, however stored or transmitted.

School curriculum / internal use:

Photographs/digital images or video footage taken for curricular use, or for displays, workbooks, school trips, notice boards, school events and/or assessment purposes.

School Publicity photography

Photographs/digital images/video footage used to help promote and publicise the success of the school through newsletters or the prospectus. This may on occasion also involve outside agencies such as the local press.

School Websites / Social Media photography

Photographs/digital images/video footage used to celebrate individual, class and/or team success, for promotional purposes, or highlight good practice within the school.

School Photographer

Class and individual/family school photographs taken by a reputable commercial photographer and sold to parents. Parents are always advised of this in advance and will have the opportunity to consent.

School Events

Photographs or videos taken of school concerts, productions and other performance events, sports events (including sports day), sports fixtures, fetes, enrichment and 'challenge' events, educational visits, services, etc. Unobtrusive and sensitive photography will normally be permitted, if it is possible at a particular point in the event, though some restrictions may be necessary for reasons of safeguarding/ child protection or out of respect for the rights and privacy of parents who have not provided consent for their child being photographed. Video or sound recording of copyright musical or theatrical performance is normally forbidden.

The Legal Position

It is not illegal for photographs of children to be taken in school by staff and using school equipment, but it is sensible to comply with all current recommendations and/or good practice since photographs and video images of individuals are classed as personal data under Data Protection Legislation. Therefore, such images may only be used for school publicity or for similar purposes in cases in which the consent of the parent or legal guardian has been collected.

In our MAT, we will not display personal images on websites, in publications or in a public place where such consent has not been given and will avoid naming individual children unless consent to do so has been given.

It is standard practice for a photograph to be recorded of each child and stored on the school MIS system for safeguarding purposes.

Parental Consent

As a minimum requirement, all parents/carers will need to know that their children may be photographed at school, and the opportunity will always be open for parents to withhold or withdraw consent for:

1. Photographs or videos taken by members of staff for school-based publicity and promotional purposes and to celebrate achievement (e.g. school newsletters/ prospectus / websites / social media)
2. Photographs or videos taken by members of the press who are on the school premises by invitation in order to celebrate individual, group or school success.
3. Photographs or videos taken by parents and other family members of children at the school during school concerts, performances, sports events and other similar events organised by the school.

The Consent Form will be issued to all parents as part of the school admission process and a central file record retained of any responses received. If consent is not specifically given by a parent/carer, then the school will infer that consent has not been granted. The views of parents who, for any reason do not wish their child/children to appear in such photographs will be respected at all times and all reasonable measures will be taken to ensure compliance with their request, including when on educational visits, sports fixtures, etc.

Use and Storage of Photographs and Video Images

Photographs taken as records of events or for educational purposes may be displayed around school on display boards and/or in evidence files and are then archived after use in line with the Record Retention Policy.

Photographs:

Are not exchanged with anyone outside school or held for private use. Members of staff are only permitted to take photographs and/or digital images of children in "school or educational provision settings" and may only use school approved and purchased cameras or recording equipment. The use of personal mobile phones to take digital images is not permitted. Neither staff nor other adults within school are permitted to take photographs of children in a one to- one situation or when children are in vulnerable situations, such as when they are upset or not appropriately dressed. Photographs may only be stored in a secure location for example on the school's internal server.

As part of specific curriculum items and on certain special occasions (e.g. at leavers' ceremonies), children may be allowed by staff to take photographs of each other. This will always be at the discretion of staff, who will intervene if necessary, in order to prevent the taking of inappropriate images or videos.

Should the school learn about any inappropriate use of images involving children, the school will take immediate and proportional action including, if judged necessary by staff in consultation with the Headteacher, recording and reporting of any incidents which could raise child protection concerns.

Photography during school events

While we recognise and will try to accommodate the wishes of family members to take photographs or videos of their own children or grandchildren during school events, including concerts, productions and other performance events, sports days, etc., we also recognise that the taking of photographs, videos and the increasing use of mobile phones to record images can prove very distracting to both the performers and others in the audience, especially if carried out insensitively.

It is also the responsibility of the school to ensure that we are compliant with safeguarding requirements at all times and do not put at risk the safety of any vulnerable children. In addition, such events can involve all children throughout school or at the very least all the children from a particular key stage, and sometimes may even include children from other schools, such that complying with the wishes of those parents who do not wish their child to be photographed is a complex and sensitive matter.

In order to minimise disturbance, the school will, if possible, arrange for official photographs of concerts, productions and other such performance events to be recorded by nominated and DBS checked individuals (e.g. staff, governor, parent). These photographs and/or video could then be made available to parents for a donation to school funds shortly after the event when they sign to say it is solely for personal use and not for distribution. However, if family members do wish

to take photographs or video with their own cameras during a performance, or indeed during any other school event, the school will normally permit this, providing that the following ground rules are adhered to in order to respect others and ensure safeguarding is not compromised:

In the case of concerts, productions and other performance events:

- As an invited guest of the school ensure that you follow their requests as to when and where you can safely take photographs, and only of your own child. This will usually be at the end of an event and only in a particular area.
- Every effort will be made that any and all images taken at school events are exclusively for personal use and are not uploaded to the internet under any circumstances, posted on social networking sites or openly shared in other ways.
- Refrain from taking further photographs and/or video if and when requested to do so by staff. To avoid any disappointment and confusion, all parents will be notified of the requirement to observe the constraints on the use of photography and digital images in advance of any school performances, productions or other similar events.

As noted above, it may be necessary for the school to request that no photography or filming take place at a school event (for example, to account for specific safeguarding needs, for copyright or performance rights). In such circumstances, this restriction will, as far as possible, be made clear to all those attending before the event begins. Anyone who continues to take photographs, video or other images after being informed of such a restriction will be asked by a member of staff to stop and to delete any material they have recorded.

Please note that the use of personal cameras, mobile phone cameras or other recording equipment is prohibited on school premises at all other times. Children may then only be photographed by members of staff and using school equipment, and only if the parents or legal guardians of a child have consented.

Please speak to the Headteacher if you are unsure about the appropriate use of photographic or recording equipment and/or subsequent use and sharing of images.

School Websites / Social Media

School websites support communication with parents and pupils and helps to promote and publicise the success of the school. Pupil's schoolwork is sometimes displayed on the website and can occasionally include discreet images of children engaged in curriculum or enrichment activities. Images of children are never used in cases in which parents or legal guardians have not given consent. Any requests from parents to remove images of their children will always be respected but parents must realise that images/videos posted in a public domain such as the school's website/social media account are accessible from the wider world

Reviewed by:	Martin Dorrington	July 2026
Senior Lead Review:	Rob Darling	September 2026
Next Review Date:		September 2028
Approved by Directors:		21.09.26

Signed:



Lois Whitehouse
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Alice Wright
Chair of Finance