



2023-2024

On behalf of the Lionheart Educational Trust:

The Lionheart Educational Trust takes the protection of personal and sensitive information very seriously. This statement is to ensure authorised adults, pupils, staff, community and stakeholder confidence in the methods the Trust have in place to ensure security, integrity and confidentiality of all personal and sensitive data.

Data protection by design is at the heart of developing and maintaining our core systems and procedural developments.

Further to this, we can confirm that:

- A policy is in place for the protection of personal data within the Lionheart Educational Trust which has been approved by the Trust Board and communicated to all employees and other relevant people.
- All employees have received awareness training regarding data protection and the UK GDPR.
- Everyone understands their roles in the protection of personal data and has received regular training.
- We have identified the personal data we process, including where special categories are involved.
- For each occasion we process personal data, we have established the lawful basis of the processing under the UK GDPR.
- In those cases where our processing is based on consent, we have taken steps to ensure clear, free consent has been given and is recorded, including consideration of parental consent for children. We have made it clear to all parties how consent can easily be withdrawn at any time.
- We have put in place a blended approach, using just in time privacy notices and a layered privacy policy, to ensure that the required privacy information is provided in clear language whenever we collect personal data.
- Tested procedures are in place to promptly process subject access requests, consent withdrawal requests, rectification requests and requests for data to be removed (right to be forgotten).
- The length of time we keep personal data for, or the way we decide this, has been defined in each area of processing, and upholds the data minimisation principle. We have set a clear retention schedule in our Trust Records Management Policy.
- We keep records of all data processing as required by the UK GDPR.
- Where we are a controller, all of our contracts with processors have been updated to comply with the requirements of the UK GDPR.

- Where we act as a processor, we have contractually committed to complying with the requirements of the UK GDPR.
- All of our employees are subject to confidentiality obligations with respect to personal data.
- Where we transfer personal data internationally, we have ensured that the transfer is legal under the UK GDPR. Where we transfer internationally, we have ensured the data subjects are aware of this.
- Routine data transfer that is necessary for our core school business processes are secure and use industry standard encryption methods. We regularly review our processes for data transfer in line with new technological developments.
- Where appropriate, a data protection impact assessment approach which is in line with the requirements and recommendations of the UK GDPR and relevant best practice will be used.
- By default, we plan for data protection in new or changed services and systems, including minimising our use of personal data and protecting it via techniques such as pseudonymisation.
- We have tested the procedures that are in place to fulfil our obligations in the event of a breach of personal data, both as a controller and as a processor.
- We have policies and other controls in place to provide appropriate protection of personal data, based on a careful assessment of risk.
- We have a robust IT infrastructure which has been implemented using the secure by design principle.
- Our password policy requires a strong, complex password. We regularly perform password validity reviews for all users.
- We hold the Cyber Essentials Plus certification.
- We data map the personal information flow for each school on a regular basis. We have appointed a Data Protection Officer:

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We will continue to develop and improve our data protection policies and controls over time, guided by legal requirements and the needs and preferences of our customers and partners.

Ben Jackson

Chief Operating Officer
Senior Information Risk Owner (SIRO)
Lionheart Educational Trust