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Charity Commission Registration number 1148017

## **Apollos Trust**

Document Name:	<b>Data Protection Policy</b>
Approved by the Trustees on:	[28 November 2018]
Review Schedule	Every two years
Next review due	November 2020

## **Document Description**

This document outlines our legal obligations under the General Data Protection Regulation and the policies for compliance.

## **Implementation and Review**

Implementation is immediate and this Policy shall stay in force until any alterations are formally agreed.

The Policy will be reviewed every two years by the Trustees, or sooner if legislation, best practice or other circumstances indicate this is necessary.

## **General Data Protection Regulation Policy**

### **1. Introduction**

The Apollos Trust (the “Trust”) is a charitable trust whose objective is to advance education for the public benefit, in particular but not exclusively religious education in a way which is consistent with a religious ethos through the employment of schools workers to work within Homewood School, Tenterden, or any primary school in the catchment area of Homewood School and The Marsh Academy, New Romney, or any primary school in the catchment area of the Marsh Academy.

The personal data that the Trust processes is done so to deliver its objective to its funders, supporters, beneficiaries and other individuals as necessary, including employees and suppliers’ staff. The trustees regard this legitimate purpose as the lawful basis to process its personal data.

This policy sets out the Trust’s commitment to ensuring that any personal data, including special category personal data (if any), which the Trust processes, is carried out in compliance with data protection law.

The Trust’s other data protection policy and procedures is its privacy notices (website)

### **2. Scope**

This policy applies to all personal data processed by the Trust and is part of the Trust’s approach to compliance with data protection law. All of the Trust’s trustees and employees are expected to comply with this policy.

### **3. Data protection principles**

The Trust complies with the data protection principles set out below. When processing personal data, it ensures that:

- it is processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’);
- it is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (‘purpose limitation’);
- it is all adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’);
- it is accurate and, where necessary, kept up to date and that reasonable steps will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’);
- it is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (‘storage limitation’); and
- it is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using measures (‘integrity and confidentiality’).

The Trust will facilitate any request from a data subject, who wishes to exercise their rights under data protection law as appropriate.

#### **4. Process/procedures/guidance**

The Trust will:

- ensure that the legal basis, which is set out above, for processing personal data is identified in advance and that all processing complies with the law;
- not do anything with the personal data it processes that those whose data it is would not expect given the content of this policy and the fair processing or privacy notice;
- ensure an appropriate privacy notices is in place advising employees and others how and why their data is being processed, and, in particular, advising data subjects of their rights;
- only collect and process the personal data that it needs for purposes it has identified in advance (see above);
- ensure that, as far as possible, the personal data it holds is accurate;
- only hold onto your personal data for as long as it is needed; and
- ensure that appropriate security measures are in place to ensure that personal data can only be accessed by those who need to access it and that it is held securely.

The Trust will ensure that those who handle personal data on its behalf are aware of their responsibilities under this policy.

#### **5. Data Subject Rights**

The Trust will ensure that it can facilitate any request made by an individual to exercise their rights under data protection law.

All requests will be considered without undue delay and within one month of receipt as far as possible.

#### **6. Responsibility for the processing of personal data**

The trustees of the Trust take ultimate responsibility for data protection.

#### **7. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Trust will promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Information Commissioner's Office (ICO).

#### **8. Monitoring and review**

This policy was last updated on 28<sup>th</sup> November 2018 and shall be regularly monitored and reviewed, at least every two years.