



Methodist Academies and Schools Trust (MAST)

PRIVACY NOTICE

WHO WE ARE

Methodist Academies and Schools Trust (MAST) is an educational charity operating in England. MAST is based at 25 Marylebone Road, London, NW1 5JR. MAST can be contacted on 020 7935 3723 and admin@methodistschools.org.uk. MAST's charity registration number is 1160838 and company number is 07881901.

MAST acknowledges its responsibility under the General Data Protection Regulation, which takes effect on 25 May 2018 and other related legislation (referred to in this Privacy Notice as "Data Protection Law"), as a data controller. However, MAST does not meet the ICO data controller registration criteria.

WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to provide information about how the MAST will use (or "process") personal data about individuals including: its staff, volunteers and other data subjects in contact with MAST.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, volunteers, and other data subjects are all encouraged to read this Privacy Notice and understand MAST's obligations.

This Privacy Notice applies alongside any other information MAST may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to the MAST's other relevant terms and conditions and policies, including:

- MAST's retention of records policy (policy shared with MIST);
- MAST's IT policies, including its Acceptable Use policy, Remote Working policy and Bring Your Own Device policy (policies shared with MIST).

Anyone who works for, or acts on behalf of, MAST (including staff, volunteers and service providers) should also be aware of and comply with this Privacy Notice and, if applicable, the data protection policy for staff/volunteers, which also provides further information about how personal data about individuals will be used.

RESPONSIBILITY FOR DATA PROTECTION

MAST has appointed the Information & Communications Manager as Data Protection Lead who will deal with all your requests and enquiries concerning MAST's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with



this policy and Data Protection Law. Information & Communications Manager (dataprotection@methodistschools.org.uk, 020 7935 3723)

WHY MAST NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff and volunteers MAST needs to process a wide range of personal data about individuals (including current, past and prospective staff and volunteers) as part of its operations.

Some of this processing MAST will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract/agreement with its staff/volunteers.

Other uses of personal data will be made in accordance with MAST's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

MAST expects that the following uses will fall within that category of its "legitimate interests":

- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- To enable relevant authorities to monitor performance and to intervene or assist with incidents as appropriate;
- To safeguard welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of MAST's IT and communications systems in accordance with MAST's IT: Acceptable Use policy;
- To make use of photographic images of pupils in Trust publications and on the Trust website in accordance with schools' policies on taking, storing and using images of children (MAST does not use social media);
- To carry out or cooperate with any MAST or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for MAST's purposes, including to obtain appropriate professional advice and insurance.

In addition, MAST will on occasion need to process special category personal data (concerning health, religion for example) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- To safeguard welfare
- In connection with employment of its staff or volunteers, for example DBS checks.



- As part of any MAST complaints or external complaints, disciplinary or investigation process that involves such data, for example if there are health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY MAST

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- bank details and other financial information, e.g. expenses paid to volunteers;
- personnel files, including in connection with academics, employment or safeguarding;
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- correspondence with and concerning staff and volunteers (past and present); and
- images of pupils (and occasionally other individuals) engaging in school activities, in accordance with the schools' policy on taking, storing and using images of children).

HOW MAST COLLECTS DATA

Generally, MAST receives personal data from the individual directly This may be via a form (e.g. Trustee application form), or simply in the ordinary course of interaction or communication (such as email).

However, in some cases personal data will be supplied by third parties (for example the Methodist Church, or other professionals or authorities working with MAST); or collected from publicly available resources for example the Minutes and Directory of the Methodist Conference widely published annually.

WHO HAS ACCESS TO PERSONAL DATA AND WHO MAST SHARES IT WITH

Occasionally, MAST will need to share personal information relating to staff and/or volunteers, such as:

- professional advisers (e.g. lawyers, insurers and accountants);
- government authorities (e.g. DfE, police or the local authority); and
- appropriate regulatory bodies e.g. OFSTED, the Charity Commission or the Information Commissioner.

Personal data collected by MAST will remain within MAST and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of safeguarding files, if processed.



Finally, in accordance with Data Protection Law, some of MAST's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the office's specific directions.

HOW LONG MAST KEEPS PERSONAL DATA

MAST will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff and volunteer personnel files is up to 7 years following departure from the Trust. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how our retention policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Information & Communications Manager (dataprotection@methodistschools.org.uk 020 7935 3723). However, please bear in mind that MAST will often have lawful and necessary reasons to hold on to some personal data even following such request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

YOUR RIGHTS

- **Rights of access – Data Subject Access Requests (DSARs)**

Individuals have various rights under Data Protection Law to access and understand personal data about them held by MAST, and in some cases ask for it to be erased or amended or have it transferred to others, or for MAST to stop processing it – but subject to certain exemptions and limitations. You can find out more about your rights under applicable Data Protection Law from the Information Commissioner's Office website available at www.ico.org.uk.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Information & Communications Manager (dataprotection@methodistschools.org.uk).

MAST will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information).

MAST will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, MAST may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).



- **Requests that cannot be fulfilled**

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to legal privilege (for example legal advice given to or sought by MAST, or documents prepared in connection with a legal action).

MAST is also not required to share any confidential reference given by MAST itself for the purposes of the education, training or employment of any individual.

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

DATA ACCURACY AND SECURITY

MAST will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as requested. Individuals must please notify the Information & Communications Manager (dataprotection@methodistschools.org.uk) of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why MAST may need to process your data, of who you may contact if you disagree.

MAST will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access. All staff and volunteers will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

THIS POLICY

MAST will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the Information & Communications Manager (dataprotection@methodistschools.org.uk, 020 7935 3723).

If an individual believes that MAST has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the Trust's complaints procedure and should also notify the Information & Communications Manager. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the data controller before involving the regulator.

June 2018

