

# **cross**teach Data Protection and Privacy Policy

<b>DATE APPROVED</b>	Sept 2018		
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<b>SIGNED:</b> <b>National Director</b>		<b>DATE</b>	
<b>SIGNED:</b> <b>Chair Of Board of Trustees</b>		<b>DATE</b>	

## **Contact Info**

Cross Teach Trust

Registered Address:  
9-11 Dormer Place  
Leamington Spa  
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07518054135

Charity Number: 1088477

## **Who we are**

Our mission: To teach about the Christian faith in schools

Our vision: For pupils to develop spiritually through understanding, engaging with and responding to the Christian faith

Our aims:

- To provide direct encounters with Christians speaking about their faith which are enjoyable, memorable and challenging.
- To teach informed RE lessons that provoke critical enquiry and thoughtful reflection.
- To lead inspiring, stimulating Collective Worship.
- To run extracurricular activities that allow pupils to explore fundamental questions about human life, religion and belief.

Our approach:

- Professional: engaging, trained, organised, experienced and working within national and local requirements and guidelines
- Reputable: working in schools with integrity and transparency since 2001
- Distinctively Christian: knowledgeable, authentic and passionate about the Christian faith
- Collegiate: working in partnership with schools at their invitation and under their direction, and alongside local churches and other school visitors

**cross**teach is an educational charity which has been teaching about the Christian faith in schools since 2001. We visit lots of different types of schools – primary and secondary, community and Church of England, private and state-funded, academy and maintained.

“As a member of the Standing Advisory Committee for Religious Education serving that school and in my current area of work I have recommended **cross**teach without hesitation.” Gerry Cohen, Barnet SACRE

We want everyone who supports us, or works with us, to feel confident and comfortable with how any personal data you share with us will be looked after or used. This Data Protection and Privacy Policy sets out how we collect, use and store your personal data (this means any data that identifies or could identify you).

The **crosssteach** Data Protection and Privacy Policy may change so please remember to check back from time to time. Where we have made any changes to this Policy, we will make this clear on our website or contact you about any changes.

We only exist because of our amazing supporters, volunteers, trustees and staff.

We want you to know that we really value your support, whether that's through taking action, giving up your time, working for us or with us, fundraising on our behalf, making a gift in your will or donating. We are committed to treating you in a way that is professional, reputable, distinctively Christian and collegiate;

### **Professional**

- If you tell us you'd rather not be contacted, or you'd rather we didn't contact you in a certain way, we'll act on your wishes.
- You can change your mind about what you receive from us at any time.
- We will always respect your right to privacy and adhere to laws around the use of data.
- We'll train, monitor and regulate our external suppliers to meet our standards. We will act quickly if they do not meet the high standards we set.

### **Reputable**

- We'll answer any question you have about how your donation is spent and clear financial data will be available.
- We might turn down a donation if we feel that accepting it would damage our independence or reputation. If we do, we'll explain why.
- We will only work with professional organisations that meet our high standards.

### **Distinctively Christian**

- We will aim to work above and beyond the standards set out by regulatory bodies, having Biblical standards as our goal.
- Your donation will be used responsibly as we endeavour to be faithful stewards with the resources entrusted to us as we seek us to teach about the Christian faith in schools. We will keep administration costs to a minimum without jeopardising the quality of our work, so as much of your donation as possible will be spent directly on our valuable work.
- We will respond honestly and promptly to your questions and complaints, as we seek to imitate Christ, who we believe is the source of truth.

### **Collegiate**

- We hope you'll want to hear more about our work. We'll always be clear with you about how we'll communicate with you.
- Fundraising is really important to us and we are thankful for the many generous supporters who work with us to achieve our mission. We will constantly review our fundraising practices to make sure they are fair, sensitive and appropriate.
- We will work with any external suppliers and/or partners to make sure they understand the issues we work with and adhere to our safeguarding policies.
- We may use carefully selected suppliers to help us deliver our communications and services and we will keep any personal data safe, only using your details to contact you in the ways you've agreed to.
- When necessary, we may share data with our own carefully regulated and monitored external suppliers, for processing purposes. We will ensure their use of the data is in line with our own data protection policies and not kept or used by them for any other purposes.
- You can contact us with feedback or to make a complaint if you are unhappy with anything we have done while communicating with you.

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### 1. Aims

**crossteach** aims to ensure that all personal data collected, stored, processed and destroyed about any natural person, whether they be a member of staff, trustee, volunteer, partner church representative, partner school representative, pupil, supporter or other individual **crossteach** may work with, is done so in accordance with the General Data Protection Regulation (GDPR) and the expected provisions of the forthcoming revised Data Protection Act 2018 (DPA 2018) as set out in the current Data Protection Bill. This policy will be reviewed in line with the implementation of this new legislation.

This policy applies to all personal data, collected, stored, processed and destroyed by **crossteach**, regardless of whether it is in paper or electronic format, or the type of filing system it is stored in, and whether the collection or processing of data was, or is, in any way automated.

### 2. Legislation and guidance

This policy meets the requirements of the GDPR and the expected provisions of the DPA 2018. It is based on guidance published by the Data Commissioner's Office (ICO) on the GDPR and the ICO's code of practice for subject access requests. It is also based on the ICO guidance on GDPR, and data provided by the Article 29 Working Party.

It also meets the DBS Code of Practice in relation to handling sensitive data.

As with all **crossteach** policies, our Data Protection Policy meets the expectations stated within our Deeds of Trust.

### 3. Definitions

#### Term

#### Definition

<b>Data controller</b>	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
<b>Data processor</b>	A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller, following the Controller's instruction.
<b>Data subject</b>	The identified or identifiable individual whose personal data is held or processed.
<b>Consent</b>	Freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
<b>Personal data</b>	<p>Any data relating to an identified or identifiable natural person ('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</p> <ul style="list-style-type: none"><li>• name,</li><li>• an identification number,</li><li>• location data,</li><li>• an online identifier or</li><li>• to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.</li></ul>
<b>Special categories of personal data</b>	<p>Personal data which is more sensitive and so needs more protection, including data about an individual's:</p> <ul style="list-style-type: none"><li>• Racial or ethnic origin</li><li>• Political opinions</li><li>• Religious or philosophical beliefs</li><li>• Trade union membership</li><li>• Genetics</li><li>• Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes</li><li>• Health – physical or mental</li><li>• Sex life or sexual orientation</li><li>• history of offences, convictions or cautions *</li></ul>

\* Note: whilst criminal offences are not classified as “sensitive data” within GDPR, within this policy template we have included them as such as acknowledgement of the care needed with this data set.

## Processing

Any operation or set of operations which is performed on personal data or on 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.

Processing can be automated or manual.

## Data breach

A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

## 4. The data controller

**crossteach** processes personal data relating to staff, trustees, volunteers, partner church staff, partner school staff, supporters, pupils and others, and therefore is a data controller and a data processor.

**crossteach** is not required to register with the ICO.

## 5. Roles and responsibilities

This policy applies to **all staff** employed by **crossteach**, and to external organisations or individuals working on our behalf. Staff who do not comply with this policy may face disciplinary action.

### 5.1 Board of Trustees

The Board of Trustees has overall responsibility for ensuring that crossteach complies with all relevant data protection obligations.

### 5.2 Data Protection Officer

The data protection officer (DPO) for **crossteach** is Wayne Harris and is contactable via wayne.harris@crossteach.com or by using the contact details at the front of this document.

They are responsible for overseeing the implementation of this policy in the first instance, before reviewing our compliance with data protection law, and developing related policies and guidelines where applicable.

The DPO will provide an annual report of **crossteach** compliance and risk issues directly to the board of trustees and will report to the board their advice and recommendations on **crossteach** data protection issues.

A regular monitoring report will be provided to each local team within **crossteach**, which will be reviewed by the local Team Leader.

The DPO is also the first point of contact for individuals whose data **crossteach** processes, and for the ICO. Full details of the DPO’s responsibilities are set out in their job description.

### 5.3 Team Leaders

The local Team Leader acts as the representative of the data controller on a day-to-day basis, within each local team.

### 5.4 All staff

Staff (regardless of role) are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy.
- Informing **crossteach** of any changes to their personal data, eg a change of address, telephone number, or bank details.
- Contacting the DPO:

- With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure.
- If they have any concerns that this policy is not being followed.
- If they are unsure whether or not they have a lawful basis to use personal data in a particular way.
- 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.
- If there has been a data breach.
- Whenever they are engaging in a new activity that may affect the privacy rights of individuals.
- If they need help with any contracts or sharing personal data with third parties.

## 6. The GDPR Data protection principles

The GDPR is based on 6 data protection principles that **crossteach** must comply with.

These are that data must be;

- Processed lawfully, fairly and in a transparent manner;
- Collected for specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed;
- Accurate and, where necessary, kept up to date;
- Kept for no longer than is necessary for the purposes for which it is processed;
- Processed in a way that ensures it is appropriately secure.

This policy sets out how **crossteach** aims to comply with these key principles.

## 7. Collecting personal data

### 7.1 Lawfulness, fairness and transparency

We will only process personal data where we have one of 6 'lawful basis' (legal reasons) to do so under data protection law:

- The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear **consent**.
- The data needs to be processed so that the school can **fulfil a contract** with the individual, or the individual has asked **crossteach** to take specific steps before entering into a contract.
- The data needs to be processed so that **crossteach** can **comply with a legal obligation**.
- The data needs to be processed to ensure the **vital interests** of the individual e.g. to protect someone's life.
- The data needs to be processed so that **crossteach** can perform a task **in the public interest**, or to carry out its official functions, and the task or function has a clear basis in law.
- The data needs to be processed for the **legitimate interests** of **crossteach** or a third party (provided the individual's rights and freedoms are not overridden).

For special categories of personal data, we will also meet one of the special category conditions for processing which are set out in the GDPR and Data Protection Act 2018.

These are where:

- The individual (or their parent/carer when appropriate in the case of a pupil) has given explicit consent.
- It is necessary to fulfill the obligations of controller or of data subject.
- It is necessary to protect the vital interests of the data subject.

- Processing is carried out by a foundation or not-for-profit organisation (includes religious, political or philosophical organisations and trade unions).
- The personal data has manifestly been made public by the data subject.
- There is the establishment, exercise or defence of a legal claim.
- There are reasons of public interest in the area of public health.
- Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment.
- There are archiving purposes in the public interest.
- The Government has varied the definition of a special category.

Whenever we first collect personal data directly from individuals, we will provide them with the relevant data required by data protection law, in the form of a privacy notice, which can be found on the **crossteach** website. Hard copies are available on request.

### 7.2 Limitation, minimisation and accuracy

We will only collect personal data for specified, explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data in our privacy notices.

If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so, and seek consent where necessary.

Staff must only process personal data where it is necessary in order to do their jobs.

When personal data is no longer required, staff must ensure it is deleted. This will be done in accordance with 'section 13: Disposal of Records' of this policy. Staff should also refer to our data processing record, which states how longer particular documents should be kept.

### 7.3 Means of collecting data

We want to make sure you receive the communications that are most relevant to you, be it through visiting our website or receiving emails, post or phone calls. We want to make sure you receive the best attention when you book on an event, become a volunteer or make a donation.

We collect data from you in the following ways:

**When you interact with us directly:** This could be at a church presentation, when you register with us for training, make a donation to us, ask a question about our work, apply for a job or volunteering opportunity or otherwise provide us with your personal data. This includes when you phone us, visit our website, email us, or get in touch through the post, or in person.

**When you interact with us through partners or the schools we work with:** This could be if you volunteer for a church-based Experience which is delivered in partnership with a trusted organisation working with us and always under our instruction.

**When you interact with us through third parties:** This could be if you provide a donation through a third party such as CAF, KindLink or one of the other third parties that we work with and provide your consent for your personal data to be shared with us.

**When you visit our website:** We do not share personal data provided via our website with third parties nor do we store any data about your visit to this website and blog other than to analyse and optimise your content and reading experience through the use of cookies (our Cookie Policy and data can be read here: )

If you contact us via our 'Contact Us' web page, no personal data will be stored by the website, but the data will be retained within the generated email until your request has been dealt with.

**Cookies** Our website uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store data for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the About Cookies website which offers guidance for all modern browsers.

When someone visits [www.crossteach.com](http://www.crossteach.com) we use a third party service, Google Analytics, to collect standard internet log data and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This data is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable data through our website, we will be up front about this. We will make it clear when we collect personal data and will explain what we intend to do with it.

**When you interact with us via social media:** We do not transfer your personal data from social media to any other data storage. Nor do we share any such data with 3<sup>rd</sup> parties.

If you send us a private or direct message via social media, it will be retained for 3 months.

**When you buy a ticket for an event:** from time to time we use [billetto.co.uk](http://billetto.co.uk) to sell tickets to an event we are running.

You can read the [billetto.co.uk](http://billetto.co.uk) Terms and Privacy Policy here:

<https://billetto.co.uk/pages/terms>

**crossteach** only receives the personal data needed for the purposes of informing you about the event and for any follow up directly related to the event.

#### 7.4 The types of personal data we collect

The personal data we collect might include your name, address, email address, IP address, and data regarding what pages are accessed and when. If you make a donation online your card data is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions.

#### 7.5 Privacy Notices

This policy covers all aspects of data protection and privacy. We provide specific Privacy Notices to all individuals who we collect personal data from, at the point at which we request their personal data, with details of how we collect and use and their data. We also include our contact details, a link to this policy and details of how to contact the ICO.

#### 7.6 Failure to provide personal data

If you fail to provide certain data when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

#### 7.7 Sensitive Personal Data

Data Protection Law recognises that some categories of personal data are more sensitive. Sensitive Personal Data can include data about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

If you provide a testimony about our work or contact us through general communications with us such as blogs or emails, you may choose to provide details of a sensitive nature.

We will only use this data:

- For the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide.
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to others or children contacting us and sharing serious issues such as physical abuse or exploitation.
- Where you have given us your express consent or otherwise clearly indicated to us (for example, by submitting a testimonial through our website) that you are happy for us to share your testimonial, then we may publish it on our website or in other media.

If you share your personal testimony, we may collect sensitive personal data. If you provide us with any Sensitive Personal Data by telephone, email or by other means, we will treat that data with extra care and confidentiality and always in accordance with this Privacy Policy.

You can of course decide if you want to remain anonymous, if you are happy to share your personal details with staff members or if you would like us to share your testimonial with the media or other parties as part of our work informing people of the impact our work has in schools.



## 8. Processing and sharing personal data

We will process and/or share personal data where it is required to fulfil our contract with employees, such as;

- A 3<sup>rd</sup> party payroll provider
- A pension provider
- HMRC

We will process and/or share personal data where legally required, such as;

- Trustee details for the Charity Commission
- Reclaiming Gift Aid

We will process and/or share personal data where there are legitimate interests for **crossteach** (within the legally described boundaries), such as;

- Trustee details when applying to Trust Funds for donations
- Annual Reports for donors

Whenever we process your Personal Data under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal data if we feel that there is an imbalance.

We will process and/or share personal data where we have explicit consent for things such as;

- To process a donation you have made;
- Seeking your views or comments on the services we provide;
- Sending you communications which you have requested and may be of interest;
- Sending you data about our financial needs, campaigns and appeals.

We will not normally process and/or share personal data with anyone else, but may do so where:

- There is an issue with a pupil or parent/carer that puts the safety of our staff at risk.
- We need to liaise with other agencies or services – we will seek consent as necessary before doing this where possible. E.g. the schools where we work usually require a list of staff and volunteers with DBS and other safeguarding data.
- Our suppliers, contractors or partners need data to enable us to provide services to schools – for example, local churches. When doing this, we will:
  - Only appoint suppliers or contractors, or work with partners, which can provide sufficient guarantees that they comply with data protection law, and have satisfactory security measures in place.
  - Establish a data sharing agreement with the supplier, contractor or partner, either in the contract or as a standalone agreement, to ensure the fair and lawful processing of any personal data we share.
  - Only share data that the supplier, contractor or partner needs to carry out their service, and data necessary to keep them, and others, safe while working with us.

We will also process and/or share personal data with law enforcement and government bodies where we are legally required to do so for:

- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- The assessment or collection of tax owed to HMRC
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided.

We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our staff, or pupils when working in schools.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose, If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allow us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 9. Individuals Rights under GDPR

### 9.1 Subject access requests

Individuals have a right to make a 'subject access request' to access personal data that **crossteach** holds about them. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- The source of the data, if not the individual
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual.

While **crossteach** will comply with the GDPR Regulations in regard to dealing with all Subject access requests submitted in any written format, individuals are asked to preferably submit their request by letter, email or fax addressed or marked for the attention of the Data Protection Officer. They should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the data requested

If staff receive a subject access request they must immediately forward it to the DPO.

### 9.2 Children and subject access requests

Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent.

Children below the age of 12 are generally not regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils at our school may be granted without the express permission of the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

### 9.3 Responding to subject access requests

When responding to requests, we:

- May ask the individual to provide 2 forms of identification from the list below
  - passport
  - driving licence
  - utility bills with the current address
  - Birth / Marriage certificate
  - P45/P60
  - credit card or mortgage statement

- May contact the individual via phone to confirm the request was made
- Will respond without delay and within 1 month (30 calendar days) of receipt of the request
- Will provide the data free of charge
- May tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous. We will inform the individual of this as soon as possible, and explain why the extension is necessary.

We may not disclose data if it:

- Might cause serious harm to the physical or mental health of an individual; or
- Would mean disclosing data about another individual who can be identified from that data, except where:
  - The other individual has consented to the disclosure; or
  - It is reasonable in all the circumstances to comply with the request without that individual's consent.
- Is a confidential reference we provide for the purposes of an individual's education, training or employment or the provision of a service by them.
- Is a reference we receive. In these circumstances we will apply the usual principles about subject access to decide whether to provide some or all of the data contained in the reference.

It might be difficult to disclose the whole of a reference to the individual it relates to without disclosing some personal data about the author of the reference. If a question of confidentiality arises, we will contact the author to find out whether they object to the reference being disclosed and, if so, why.

Even if the provider of a reference objects to its disclosure in response to a SAR, we will supply the personal data it contains to the requester if it is reasonable to do so in all the circumstances. In deciding this, we will weigh the referee's interest in having their comments treated confidentially against the requester's interest in seeing what has been said about them. Relevant considerations are likely to include:

- any clearly stated assurance of confidentiality given to the referee;
- any reasons the referee gives for withholding consent;
- the likely impact of the reference on the requester;
- the requester's interest in being able to satisfy himself or herself that the reference is truthful and accurate; and
- any risk that disclosure may pose to the referee.
- Is publicly available data. If an enactment requires **crossteach** to make data available to the public, any personal data included in it is exempt from the right of subject access.

The exemption only applies to the data that **crossteach** is required to publish. If it holds additional personal data about an individual, the additional data is not exempt from the right of subject access even if **crossteach** publishes it.

- Is likely to prejudice action for crime and taxation purposes;
  - the prevention or detection of crime;
  - the capture or prosecution of offenders; and
  - the assessment or collection of tax or duty.
- Management forecasting or management planning data is exempt from the right of subject access to the extent that complying with a SAR would be likely to prejudice the business or other activity of **crossteach**.

If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which would only take into account administrative costs.

A request will be deemed to be unfounded or excessive if it is repetitive, or asks for further copies of the same data.

When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO.

#### 9.4 Other data protection rights of the individual

In addition to the right to make a subject access request and to receive data when we are collecting their data about how we use and process it, individuals also have the right to:

- Withdraw their consent to processing at any time;
- Ask us to rectify, erase or restrict processing of their personal data, or object to the processing of it in certain circumstances;
- Prevent use of their personal data for direct marketing;
- Challenge processing which has been justified on the basis of public interest;
- Request a copy of agreements under which their personal data is transferred outside of the European Economic Area;
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect them);
- Prevent processing that is likely to cause damage or distress;
- Be notified of a data breach in certain circumstances;
- Make a complaint to the ICO;
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

Individuals should submit any request to exercise these rights to the DPO. If staff receive such a request, they must immediately forward it to the DPO.

## 10. Photographs and videos

As part of **crossteach** activities, we may take photographs and record images of individuals.

**crossteach** will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil.

**crossteach** uses photographs:

- Within **crossteach** brochures, newsletters and other promotional and/or informational material;
- Outside of **crossteach** by partners such as local churches, local and national newspapers and local and national campaigns we are involved with;
- Online on our **crossteach** website or social media pages.

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

When using photographs and videos in this way we will not accompany them with any other personal data about the child, to ensure they cannot be identified.

See our Safeguarding and Child Protection Policy for more data on our use of photographs and videos.

## 11. Data protection by design and default

We will put measures in place to show that we have integrated data protection into all of our data collection and processing activities. These include, but are not limited to the following organisational and technical measures:

- Appointing a suitably qualified DPO, and ensuring they have the necessary resources to fulfil their duties and maintain their expert knowledge;

- Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection regulations;
- Completing data privacy impact assessments where the **crossteach's** processing of personal data presents a high risk to rights and freedoms of individuals, and when introducing new technologies or processing tools. Advice and guidance will be sought from the DPO;
- Integrating data protection into internal documents including this policy, any related policies and privacy notices;
- Regular, at least biannual, training members of staff, volunteers and trustees on data protection law, this policy and any related policies and any other data protection matters. Records of attendance will be kept to record the training sessions, and ensure that all data handlers receive appropriate training;
- Termly reviews and audits to test our privacy measures and make sure we are compliant;
- Maintaining records of our processing activities, including:
  - For the benefit of data subjects, making available the name and contact details of **crossteach** and DPO and all data we are required to share about how we use and process their personal data (via our privacy notices);
  - For all personal data that we hold, maintaining an internal record of the type of data, data subject, how and why we are using the data, any third-party recipients, how and why we are storing the data, retention periods and how we are keeping the data secure.

## 12. Data security and storage of records

We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.

In particular our organisational and technical measures include;

- Paper-based records and portable electronic devices, such as laptops, tablets and hard drives that contain personal data will be kept under lock and key when not in use;
- Papers containing confidential personal data must not be left on office desks, pinned to notice/display boards, or left anywhere else where there is general access;
- Staff will adhere to the **crossteach** Acceptable Use Policy, including the Password Policy;
- Staff, volunteers or trustees who store personal data on their personal devices are expected to follow the same security procedures as for **crossteach** -owned equipment (see **crossteach** acceptable use policy for further data);
- Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected.

As we make use of G-Suite (Google provided services), the data which you provide to us may be transferred to countries outside the European Economic Area (EEA). We are reassured that Google conform with GDPR and all other required data protection requirements. You can read about their data security commitments here:

[https://gsuite.google.co.uk/intl/en\\_uk/security/](https://gsuite.google.co.uk/intl/en_uk/security/)

By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your data outside of the EU in this way, we will continue to take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy.

If for any other reason, we transfer personal data to a country or territory outside the EEA, we will do so in accordance with data protection law, and will consult with affected individuals first.

## 13. Disposal of records

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

For example, we will shred paper-based records, and overwrite or delete electronic files. We may also use a third party to safely dispose of records on **crossteach's** behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law, and provide a certificate of destruction. This is then recorded on our systems.

Data will be disposed of in accordance with our Data Retention Schedule.

#### 14. Personal data breaches

**crossteach** will make all reasonable endeavours to ensure that there are no personal data breaches.

Where appropriate, we will report the data breach to the ICO within 72 hours. Such breaches in a **crossteach** context may include, but are not limited to:

- Safeguarding data being made available to an unauthorised person;
- The theft of a crossteach laptop containing non-encrypted personal data.

#### 15. Monitoring arrangements

The DPO is responsible for monitoring and reviewing this policy as part of the general monitoring and compliance work they carry out. As previously stated this policy will be reviewed after one year, and then after that point it will be reviewed every two years. **crossteach** trustees will be included as part of the review process.

#### 16. 3<sup>rd</sup> Parties we work with

We work closely with various third party product providers to bring you a range of quality and reliable products and services designed to enhance the work of **crossteach** and our communications with stakeholders. When you use one or more of these products, the relevant third party product provider will use your details to provide you with data and carry out their obligations arising from any contracts you have entered into with them. In some cases, they will be acting as a data controller of your data and therefore we advise you to read their Privacy Policy. These third party product providers will share your data with us which we will use in accordance with this Data Protection and Privacy Policy.

We may transfer your personal data to a third party if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and stakeholders. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

##### 16.1 Email

- Google

<https://policies.google.com/privacy?hl=en&gl=uk>

##### 16.2 Web site

- **crossteach.com**

- Hosting EasySpace

<https://www.easyspace.com/terms-and-conditions>

- WordPress

<https://automattic.com/privacy/>

- Support Edgehouse Solutions

<http://www.edgehousesolutions.co.uk/privacy-policy/>

- Cookies

##### 16.3 Electronic storage

- Google

<https://policies.google.com/privacy?hl=en&gl=uk>

#### 16.4 Electronic calendar

- Google

<https://policies.google.com/privacy?hl=en&gl=uk>

#### 16.5 E-Newsletter

- Mailchimp

<https://mailchimp.com/legal/privacy/>

#### 16.6 Online Donations

When you are using our secure online donation pages, your donation is processed by a third party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

- CAF

<https://www.cafonline.org/navigation/footer/privacy>

- KindLink

<https://www.kindlink.com/privacy-policy.html>

#### 16.7 Event Tickets

- Billetto

<https://billetto.co.uk/pages/terms>

#### 16.8 Electronic surveys, questionnaires and forms

- Google Forms

<https://policies.google.com/privacy?hl=en>

- SurveyMonkey

<https://www.surveymonkey.co.uk/mp/legal/privacy-policy/>

#### 16.9 Pension

- NEST

<https://www.nestpensions.org.uk/schemeweb/nest/nestcorporation/privacy-policy.html>

- Employee nominated

#### 16.10 Payroll

- Internal

#### 16.11 Legal Reporting

- Charity Commission

<https://www.gov.uk/help/privacy-policy>

- HMRC

<https://www.gov.uk/help/privacy-policy>

#### 16.12 Social Media

- Facebook

<https://www.facebook.com/privacy/explanation>

- PrayerMate

[https://www.prayermate.net/pages/app\\_privacy\\_policy](https://www.prayermate.net/pages/app_privacy_policy)

#### 16.13 DBS

- CCPAS

<https://www.ccpas.co.uk/legal>

## **17. Profiling**

We may analyse your personal data to create a profile of your interests and preferences so that we can contact you with data relevant to you. We may make use of additional data about you when it is available from external sources to help us do this effectively. We may also use your personal data to detect and reduce fraud and credit risk.

We do not use any automated decision making.